



**New Orleans Regional Transit
Authority
AGENCY SAFETY PLAN**

Effective: January 23, 2024

**New Orleans Regional Transit Authority
2817 Canal Street
New Orleans, Louisiana 70119**

Concurrences and Approvals

New Orleans Regional Transit Authority Agency Safety Plan

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Document Revision Policy

This document is intended for use by the position to which it was issued. The control version of this document is stored electronically on RTA’s “SMS” shared drive and is exclusively maintained by designated Safety Department staff. Printed copies of this document are uncontrolled and may not be current.

This plan is complemented by, and dependent on, other supporting policy documents issued by RTA, and is updated at least annually in accordance with federal and state requirements. The Chief Safety, Security, and Emergency Management Officer determines the initial distribution for this document.

Revisions/Amendments

Version Year	Revision No.	Effective Date	Revised Sections	Purpose
2021	0	7/15/2020	All	Initial issue of PTASP-compliant safety plan (49 CFR Part 673)
2021	1	3/23/2021	All	Incorporates major organizational structure changes
2022	0	1/25/2022	All	Initial Issue; minor updates
2023	0	12/13/2022	All	Aligns with FTA requirements announced in Feb. 2022 Dear Colleague letter, stemming from Bipartisan Infrastructure Law
2024	0	1/23/2024	All	Aligns with changes to statutory safety plan requirements, includes organizational structure changes

Purpose and Scope

The purpose of the Agency Safety Plan (ASP) is to set forth the requirements for identifying, evaluating and minimizing safety risk throughout the New Orleans Regional Transit Authority's (RTA) public transit system. The ASP formally establishes and reinforces RTA's commitment to a comprehensive Safety Management System (SMS) as required by the Federal Transit Administration (FTA) in 49 CFR Parts 670, 672, 673, and 674) and also by the Louisiana Department of Transportation and Development [LADOTD, herein referred to as the State Safety Oversight Agency ("SSO")] in its State Safety Oversight Program Standard (SSOPS)¹. FTA, other federal agencies, and the SSO have access to review any policy or procedure referenced in this ASP and any related SMS documentation upon request.

The ASP is specifically developed to:

- Establish the Safety Program for RTA.
- Identify both shared and individual roles and responsibilities for RTA staff and management for the safety of its entire system.
- Identify the relationships of RTA with other agencies and organizations that impact or oversee transit system safety.
- Provide formal documentation of RTA's commitment to safety together with RTA's Safety Management Policy (SAF3) and other policies.
- Provide a framework for implementing RTA's Safety Management Policy, and specifically, its comprehensive adoption of the four components of SMS (Safety Management Policy, Safety Risk Management, Safety Assurance, and Safety Promotion) in accordance with federal and state requirements.
- Ensure compliance with the National Public Transportation Safety Plan (NSP)² relative to safety goals, objectives, and targets³ that are established by FTA.
- Satisfy federal, state, and local laws, codes, ordinances, and regulations.

The RTA provides public transportation services to the City of New Orleans, Orleans, St. Bernard, and Jefferson Parishes, and the City of Kenner. The RTA system includes five streetcar lines, 34 bus routes, paratransit service, and two passenger ferry lines, all of which is supported by FTA through the Urbanized Area Formula Funding Program (U.S.C. Section 5307) as well as a combination of state and local funding sources. RTA does not provide any Section 5307 funds to any other entity to provide transit services.

Note: Per 49 CFR Part 673.11(f), agencies that operate passenger ferries regulated by the United States Coast Guard (USCG) are not required to develop agency safety plans for those modes of service. In consultation with the Marine Department and Chief Transit Officer (CTO), the Chief Safety, Security, and Emergency Management Officer (CSSEM) or designated staff will oversee contractual safety responsibility by the operator(s) of those services, including safety management program(s) developed and

¹ La. Admin. Code tit. 70 § IX

² Under 49 CFR Part 670

³ Including Risk Reduction Performance Targets under 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law

maintained by the operator(s), in accordance with any service agreements in place and with all applicable federal and state requirements. RTA designated staff assigned to safety responsibility may direct operator(s) to non-modal-specific elements of this ASP as necessary to support program development. Application/adoption of any safety requirements, processes, or practices herein will be administered and overseen through separate RTA- and operator-issued policy documents.

All positions described in this plan are directly employed by RTA unless otherwise noted. Staff serving as project or contract managers are responsible for ensuring contractors comply with the ASP and any referenced policies and procedures.

As SMS Executive, the CSSEM is directly responsible for updating the ASP to reflect the current operation in accordance with state and federal requirements.

RTA’s SMS is organized into four components and includes 11 subcomponents aligned with FTA’s SMS Framework and related federal requirements. Each subcomponent is addressed in this ASP.

Safety Management System Components

<p>Safety Management Policy</p> <ol style="list-style-type: none"> 1. Safety Management Policy Statement 2. Safety Accountabilities and Responsibilities 3. Integration with Public Safety and Emergency Management 4. SMS Documentation and Records 	<p>Safety Assurance</p> <ol style="list-style-type: none"> 7. Safety Performance Monitoring and Measurement 8. Management of Change 9. Continuous Improvement
<p>Safety Risk Management</p> <ol style="list-style-type: none"> 5. Hazard Identification and Analysis 6. Safety Risk Evaluation 	<p>Safety Promotion</p> <ol style="list-style-type: none"> 10. Safety Communication 11. Competencies and Training

PLEASE NOTE: This ASP outlines RTA’s mature SMS as described in federal and state Safety Plan requirements. It is important to note that there are a number of companion documents to this Plan that describe the specific tasks, activities, milestones, and steps that RTA continuously undertakes to achieve and maintain a compliant SMS and enhance safety. Where feasible, these documents are incorporated into one or both of the following: 1) RTA’s SMS Implementation Plan (SIP; see APPENDIX E: SMS IMPLEMENTATION PLAN), and 2) individual Corrective Action Plans (CAPs) that each describe steps that will be taken to align with this ASP. Agency progress relative to the SIP and CAPs is provided regularly to the SSO. For specific implementation status inquiries, contact the Safety Department.

Section I: Safety Management Policy

1.1 Chief Executive Officer's Safety Management Policy Statement

The RTA Safety Management Policy (SAF3) contains the agency's formal Safety Management Policy Statement and may be accessed on the RTA intranet and via ADP (for employees). It is reviewed and updated annually, to ensure it aligns with the ASP and vice versa. As SMS Executive, the CSSEM is responsible for maintaining and updating the Safety Management Policy in accordance with FTA requirements under 49 CFR Part 673.23.

1.1.1 Safety Performance Targets

Under the requirements of 49 CFR Part 673.11(a)(4), the RTA ASP must comply with FTA's NSP (codified at 49 CFR Part 670) including the establishment of safety measures and Safety Performance Targets (SPTs). While the Safety Management Policy makes reference to these targets, the SPTs themselves are established this Plan-- see APPENDIX A: 2024 SAFETY PERFORMANCE TARGETS.

The required metrics are associated with National Transit Database (NTD) reporting requirements as follows:

- **FATALITIES** (total number of reportable fatalities and rate per vehicle revenue miles, or VRM, by mode)
- **INJURIES** (total number of reportable injuries and rate per VRM by mode)
- **SAFETY EVENTS** (total number of reportable events and rate per VRM by mode)
- **SYSTEM RELIABILITY** (mean distance between major mechanical failures by mode)

Safety Performance Measure Definitions⁴

- **Fatalities**
 - Death confirmed within 30 days, excluding suicide, trespassers, illness, or natural causes
- **Injuries**
 - Harm to person that requires immediate medical attention away from the scene
- **Safety Events**
 - Collision, derailment, fire, hazardous material spill, or evacuation
- **System Reliability**
 - Major mechanical failure preventing a vehicle from completing or starting scheduled trip

⁴ FTA Safety Performance Targets Webinar, February 4, 2020 --
https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-04/SPT_Webinar_202002.pdf

SPTs are established annually in coordination with all pertinent departments, members of the executive leadership team (“ELT”), SMS Steering Committee, and the SSO. FTA data sources are closely reviewed by the Safety Department to establish baseline targets. These include the NSP and the Bus and Rail Safety Data Reports (BSDR and RSDR, respectively) if available. Additional credible sources may be added to the annual review and update process as they are made available to RTA.

1.1.2 Annual Review and Update of the ASP

RTA shall review, update, and submit the ASP to the SSO annually in compliance with the requirements of the SSOPS, as codified in La. Admin. Code tit. 70 § IX-1509.

Upon receipt of tentative approval from the SSO, the CSSEM then sends the ASP to the RTA Board of Commissioners for review and approval in accordance with 49 CFR Part 673. The internal process for review, revision as needed, and approval is found in RTA Standard Operating Procedure (SOP) 004-002.

1.1.3 Maintenance of the ASP

RTA maintains its ASP in compliance with 49 CFR Part 673.11(c), Subpart D and the SSOPS. The CSSEM ensures that the current ASP version is promptly disseminated and made available to all employees.

1.2 Safety Management Accountabilities and Responsibilities

In compliance with 49 CFR Part 673.23(d), RTA has established its organizational accountabilities and responsibilities related to its SMS in this section as well as in SAF3 and the Safety Committee Structure Policy (SAF5).

1.2.1 Key Individual SMS Accountabilities and Responsibilities

Chief Executive Officer

RTA’s CEO, as the agency’s Accountable Executive, meets the FTA criteria for the designation, per 49 CFR Part 673.23(d)(1). The CEO is ultimately accountable for ensuring action is taken, as necessary, to address substandard performance in the agency’s SMS under the requirements of 49 CFR Part 673.23 (d)(1).

As the Accountable Executive, the CEO has the following responsibilities for the SMS:

- Ensuring that the SMS is properly implemented and performed throughout the RTA organization, including employee reporting programs
- Actively and continuously communicating the RTA’s Safety Management Policy

- and related SMS-related policies throughout the agency
- Ensuring that all executive level personnel are held responsible for implementation of SMS in their respective areas; and each actively and continuously communicates the RTA Safety Management Policy, SMS-related policies, and respective area-specific SMS requirements to all employees in their areas
 - Approving this ASP and the Transit Asset Management Plan (“TAM Plan”), and knowing and understanding the contents of both documents
 - Ensuring that risk is appropriately addressed system-wide; and directing resource allocation accordingly
 - Directing required actions to address non-compliance with the ASP
 - Managing continuous improvement activities.

Chief Safety, Security, and Emergency Management Officer

The CEO has delegated the authority and responsibility for day-to-day implementation and operation of the SMS to the CSSEM. The CSSEM serves as the RTA’s SMS Executive and as such, is the agency’s Subject Matter Expert (SME) on SMS and Public Transportation Agency Safety Plan requirements.

The CSSEM reports directly to the CEO per the requirements of 49 CFR Part 673.23(d)(2). The CSSEM chairs, facilitates, and provides technical assistance to each of the safety committees established by SAF5 (or, alternatively, may delegate to a director for this role). The CSSEM may also invite the SSO or appropriate representative to participate in any safety committee established by SAF5.

As the SMS Executive, the CSSEM is responsible for the day-to-day implementation of SMS. Key safety personnel, technical management, and executive level management operate under the CSSEM’s guidance and direction to support in data collection and analysis, investigations, hazard identification and assessment, corrective action development and implementation, safety committee business, departmental and/or functional area SA and promotion activities, and other safety management undertakings.

The CSSEM is authorized to take the necessary action to ensure agency personnel have resources, training, and guidance necessary to implement SMS in everyday job performance as required in this ASP.

The CSSEM guides the areas and departments with information about safety risk management to ensure that they understand the level of safety risk and expectations as to mitigations and/or corrective actions. Once risk is assessed, each department will provide documented results of the assessment(s) to the CSSEM who will maintain a master hazard log as necessary. Generally, this process is managed “by exception,” meaning areas identified as normal or recurring hazard mitigation or resolution activities (e.g., pre-trip inspections, preventive maintenance, purchase orders) are not re-entered on the CSSEM’s log every day, but rather exceptional events, such as new and

previously unforeseen hazards, instances of practical drift, and adverse events will be entered and promptly managed in close coordination between the department and the CSSEM.

The CSSEM is responsible for the emergency management function, including preparedness and response in close coordination with local, state, and federal agencies. The position also performs oversight and safety management of the RTA's Memoranda of Understanding (MOUs) and Cooperative Endeavor Agreements (CEAs) in support of RTA's emergency plans and protocols. Also in this capacity, the CSSEM provides training for the agency in emergency-related areas including emergency exercises and drills. The CSSEM is responsible for developing and implementing an all-hazards approach to emergency planning and response, in close coordination with all other departments.

As RTA's executive officer overseeing physical security and law enforcement functions, the CSSEM is fully responsible for SMS compliance in these areas and for developing, maintaining and implementing a range of plans, programs and processes related to public safety. The CSSEM provides training for the agency in all security-related areas, including exercises and drills in accordance with RTA's Exercise Plan and All-Hazards Plan. Additionally, the CSSEM conducts regular Threat and Vulnerability Assessments (TVAs) and other audits, examinations, and reviews to assess the agency's readiness and resiliency.

The CSSEM performs the following safety-critical activities:

- Developing and maintaining the ASP
- Developing and maintaining RTA emergency operations plans including but not limited to all-hazard plans and related annexes
- Overall monitoring of the SMS program and ensuring immediate corrective actions are implemented to address deficiencies of the SMS
- Providing primary consultation and guidance on SMS implementation throughout the agency
- Providing information, recommendations, and status reports to the CEO on resource allocation supporting the SMS
- Chairing or delegating staff to chair a variety of safety and emergency management committee meetings to address system hazards and other safety concerns (also refer to SAF5)
- Conducting independent (but coordinated) SA activities, such as inspections, audits, assessments, and observations in the departments as necessary
- Conducting safety promotion activities, such as surveys, stand-downs, and campaigns in coordination with departments
- Maintaining and monitoring CAPs and Hazard Logs for the agency (which shall serve as the agency's "master" versions of such), and supporting and assisting departments in implementing mitigations and/or corrective actions
- Overseeing contractor, RTA employee, and the general public's safety during construction activities

- Monitoring and verifying departmental data analysis and trending
- Developing and conducting training as needed with external agencies, i.e., emergency responder training, contractor training, and emergency drills
- Establishing system-wide safety, security, and emergency management training objectives, training QA activities and training plans and procedures, including a training matrix by position
- Participating in and leading formal meetings with LADOTD, ELT, and other RTA management on safety issues
- Developing and supporting safety, emergency management, and system security policies, procedures, and programs
- Implementing the Internal Safety Management Audit (ISMA) Program in compliance with SSO requirements and this ASP
- Supporting and facilitating the Safety and Security Certification (SSC) Program in compliance with this ASP and the Safety and Security Certification Plan (SSCP)
- Overseeing and supporting departmental assessments, investigations, inspections, and SA activities to ensure full compliance
- Identifying safety concerns, analyzing reports and information, supporting the development of programs for improving workplace safety
- Assisting in claim investigations of work-related injuries or disabilities and preparing of files for litigation
- Establishing and implementing effective industrial hygiene and occupational policies and procedures for transportation and maintenance functions
- Establishing criteria for the selection, maintenance, and proper use of personal protective clothing and equipment
- Leading and overseeing all physical security and day-to-day Transit Police functions, including in-house and contracted elements, for the agency

1.2.2 Organizational SMS Accountabilities and Responsibilities

Beyond these key positions for instituting and promoting SMS, all members of the ELT share SMS responsibilities. As of the adoption of this ASP, the following positions comprise the ELT and share the responsibility to ensure the ASP is followed consistently throughout the organization:

- Chief Executive Officer
- Chief Safety, Security, and Emergency Management Officer
- Chief Transit Officer (CTO)
- Chief Asset Management Officer (CAMO)
- Deputy CEO Administration
- Chief of Planning and Capital Projects (CPCP)
- Chief of Staff
- Chief of External Affairs
- Chief Human Capital and Workforce Development Officer
- Chief Financial Officer

Each member of the ELT also participates in the SMS Steering Committee in

accordance with SAF5.

The subsections “Common SMS Responsibilities,” “Additional SMS Responsibilities by Level,” and “Additional SMS Responsibilities by Function” describe in greater detail the responsibilities and accountabilities owned by each department or functional area reporting to the ELT.

The current organizational chart showing the organizational relationships described below is found as APPENDIX B: ORGANIZATIONAL CHART. The chart will be updated with each update of this ASP and on an as-needed basis.

1.2.2.1 Common SMS Responsibilities

All management and staff in all functional areas are responsible for the common requirements of SMS listed in this section, as required by 49 CFR Part 673.23(d):

- A. Safety Goals and Objectives: the CSSEM or designee coordinates with each area to establish goals with corresponding objectives that support both Safety Management Policy objectives and SPTs. In consultation with the CSSEM each area monitors progress to ensure the goals, objectives, and targets (as applicable) are being met. This is primarily monitored and reviewed in ELT and SMS Steering Committee meetings. Adherence to established safety goals and objectives may also be incorporated into the performance evaluation process for certain managers and above (in development; pending).
- B. SMS Training:
 - a. Rail – Key SMS Personnel identified by the CSSEM in this ASP as having direct responsibility for safety oversight of the rail fixed guideway system must meet the requirements of 49 CFR Part 672, including refresher training at two-year intervals. The regulation requires that personnel to whom this applies must meet the requirements within three years of being hired or promoted into the “key” position. The CSSEM is responsible for ensuring the agency’s compliance with this regulation.
 - b. Director-level – As required by the CEO, all directors and above (directors and chiefs) must self-enroll in and complete the Transportation Safety Institute (TSI) course entitled “SMS Awareness” which is available online via TSI’s e-learning portal⁵. This must be completed within one year of being hired or promoted into the position. The certificate must be provided to Human Capital and Workforce Development (HCWD) for recordkeeping in the Neogov Learning Management System. Corresponding policy and position description revisions are currently in development.
 - c. All Other Personnel – Personnel not identified as Key Personnel are not required to meet 49 CFR Part 672 requirements at this time, however, they should be proficient in SMS methodologies and practices, and

⁵ <https://tsi-dot.csod.com/client/tsi-dot/default.aspx>

knowledgeable about all safety program requirements.

- i. A one-hour “SMS 101” course is delivered by the Safety Department during new-hire orientation for all new employees. Additionally, a computer-based training offering of “SMS 101” is under development and will be included in the mandatory trainings for all employees through the Neogov portal.
- C. Employee Safety Reporting Program: all employees share the responsibility to report hazards and safety concerns via approved means. Presently, hazards may be reported via the Safety Hotline, through the Hazard Report Form, via the online “Help Desk” ticket system, directly to Safety Department personnel, to a department manager, or through a safety committee.
- D. Hazard Identification, Analysis, and Mitigation: each area is responsible to identify hazards in its daily activities and responsibilities; and to fully document all of these activities, following the direction of the Safety Department. FTA guidance directs the CSSEM, as SMS Executive, to facilitate or lead department/functional area Safety Risk Management (SRM) and Safety Assurance (SA) activities, as appropriate. Formal corrective actions may be required to address any unacceptable or undesirable safety risk identified through hazard identification and risk analysis. SAF3 describes SRM and SA roles and responsibilities that all staff share. All employees in all areas must comply with this policy.
- E. SMS Implementation: all functional areas must assess their own compliance with the RTA ASP and SMS implementation objectives and action items, and regularly brief the CSSEM on SMS implementation progress. The SMS Steering Committee reserves time during its quarterly meeting for receiving and reviewing implementation status. The Safety Department compiles status notes from all other departments into an SMS Implementation Plan (SIP) Update which it updates on a quarterly basis and provides to the SSO as required.
- F. Participation in ISMAs: Progress relative to SMS implementation objectives and compliance with the ASP and referenced policies and procedures are reviewed during recurring ISMAs with each safety-critical function. Before, during, and immediately following each audit, each functional area must be responsive to the requests of the audit team and participate fully. Audits are convened by the CSSEM in accordance with SOP 004-100: Procedure for Performing Internal Safety Management Audits (ISMAs). (Also see **3.3 Internal Safety Reviews**.)
- G. SMS Documentation: requirements of both 49 CFR Parts 673 and 674 indicate that all areas must have formal documentation of all safety management activities. For record-keeping purposes safety management activities are defined as any activity pertaining to one or more of the 11 subcomponents of SMS as directed in this ASP. All SMS documentation must be reviewed as part of the annual ASP review and update process to ensure that any changes to the ASP do not create conflict. The department should consult with the Safety Department for technical assistance.
- H. Contractor Oversight: Functional areas are responsible for safety management oversight of all contractor activities (for contracts which they directly manage or oversee), documentation and safety management processes, and documentation

of those oversight activities. If specific **safety** requirements are formally directed by the CSSEM or attached to either associated procurement documents or the final contract, the staff designated as “project manager” is responsible for complying. The department should consult with the Safety Department for technical assistance.

- I. Safety Ambassador Program: Currently in development and established during a 2022-2023 Organizational Change Management pilot project, certain functional areas have been assigned a “safety ambassador” to assist with SRM and SA activities within the department and with relaying information between the Safety Department and other RTA departments. As implementation of the role continues, the CSSEM will modify applicable sections of this ASP and provide appropriate direction and guidance.

1.2.2.2 Additional SMS Responsibilities by Level

There are three levels of employee responsibility defined at RTA, described in general below:

1. Executive Level Management
2. Technical Management
3. Front-Line Employees

Each functional area is responsible for establishing and reviewing department-specific SMS responsibilities for each of these three levels consistent with the general responsibilities described in this section. The executives for each area will ensure that each employee is annually evaluated on safety performance related to those SMS responsibilities. It is highly recommended that this evaluation be incorporated into the employee’s formal performance review or appraisal.

In addition to the shared responsibilities described above, the additional SMS responsibilities for each level are as follows:

Executive level:

Executives are charged with effectively leading safety management processes and activities in their respective area(s), and actively demonstrating their commitment to safety. They accept their respective responsibilities for implementing both this ASP and the Safety Management Policy, as well as all other referenced policies and procedures. Specifically, they must ensure and be accountable that:

1. Adequate resources are available to appropriately manage safety risk in their areas.
2. Effective mitigation and corrective actions are developed, implemented in a timely fashion, and monitored appropriately to assure safety is maintained, as appropriate.
3. There are no barriers to employee reporting of safety hazards and issues, and

that reports are promptly addressed through the safety risk management process.

4. Safety management activities such as audits or reviews are fully documented and follow a standard process.
5. Safety performance goals and objectives, both in their areas of control and agency-wide, are being met, and safety performance measures, including SPTs, monitored for verification or needed corrective action.
6. They participate fully in the SMS Steering Committee and other safety committee processes.
7. Safety is a core business function in their areas and departments.
8. Safety information is shared openly with the Safety Department and all other departments in support of the SMS.
9. All significant changes are properly managed in accordance with the Management of Change section of this ASP.
10. Safety investigations, audits, inspections, and corrective actions are managed using the organizational approach; that is, focusing on organizational deficiencies and systemic issues instead of individual actions taken or errors committed by front-line employees, where feasible.
11. Adequate safety training, awareness and oversight is provided to employees in their areas of control.
12. A positive safety culture is actively fostered in their area and system wide.
13. Full and open cooperation is affected with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Technical management level:

Technical managers (typically, senior directors, directors, and managers) are charged with the following:

- ensuring directives are implemented from the executive level in safety management,
- promptly informing executives of safety lapses, failures, hazards, and resource shortages,
- visibly demonstrating commitment to safety,
- providing tools and resources needed to safely perform job requirements,
- providing information pertinent to the management of safety to employees, and
- encouraging the reporting of hazards and assuring safety is incorporated in all daily tasks and activities.

Technical Management must personally ensure and be accountable to:

1. Take strategic direction from the Executive level in all aspects of safety management, including daily activities, hazard and safety risk management, safety data, investigations, employee reporting, and safety promotion within their areas of control.
2. Ensure employees receive proper training to perform job functions safely.
3. Ensure employees are properly supervised to ensure tasks and activities are

- safely managed and performed.
4. Ensure that employee reports of hazards are properly investigated, mitigated as appropriate and reported to executive management and/or the Safety Department as appropriate; and employees are kept apprised of activities concerning their reports.
 5. Ensure that contractors and vendors are educated on RTA safety practices and are held to the same requirements.
 6. Coordinate implementation of safety mitigations and SA activities with the Safety Department as appropriate.
 7. Monitor and endorse proper safety promotion and awareness activities.
 8. Implement management of change activities in coordination with the Safety Department.
 9. Identify organizational failures with Executive management, and cooperatively work to implement mitigations and corrective actions to address failures.
 10. Participate actively in the safety committee process as directed and assigned, including preparing, reviewing, and sharing safety information.
 11. Foster a positive safety culture system wide.
 12. Cooperate fully and openly with State Safety Oversight activities, federal authorities and other external safety agencies as required.

Front-Line employees:

Front-line employees are expected to:

1. Promptly recognize and report all hazards and/or potential consequences of hazards that, without mitigation, would result in an unacceptable level of safety risk, coordinating with the Safety Department as necessary.
2. Fully participate in the safety committee process as appropriate.
3. Attend training that will aid in safe job performance.
4. Safely carry out assigned tasks in accordance with training and procedures.
5. Communicate effectively with other employees, supervision, and management.
6. Foster a positive safety culture system wide.

Each of the safety-critical areas below is fully documented through area/departmental programs, policies, plans, procedures, and protocols developed under the authority and responsibility of the Managers of each area. These documents contain detailed information on all functions, tasks, and activities, and are available from the Managers, including how safety is managed in every aspect of operations in each area.

1.2.2.3 Additional SMS Responsibilities by Function

Additional SMS responsibilities are assigned to key functional areas/departments as described in this sub-section. All functional areas identified in this ASP are deemed “safety critical” to the extent that they support safety objectives in the Safety Management Policy and/or the activities under one or more SMS components. The areas are organized by ELT member, current as of the issue date of this ASP.

Chief Transit Officer

Bus, Rail, and Paratransit Operations

RTA's CTO, Director of Bus & Rail Operations, and Managers are responsible for:

- Managing safety in all departmental functions, including appropriate hazard identification, analysis and mitigation, and safety assurance on those mitigations
- Supporting SMS system-wide, including investigations, audits, and assessments
- Training, assigning, and monitoring bus and rail operators, senior supervisors, and supervisors
- Maintaining, reviewing, and revising of the Rulebook in coordination with the CSSEM
- Implementing rules compliance programs for operators, dispatchers, and supervisors, and ensuring service quality assurance and quality control
- Reporting key performance indicators, operational data and other performance measures associated with daily tasks and activities to appropriate parties
- Investigating and managing customer complaints and taking corrective action as necessary
- Investigating employee reports of hazards and taking corrective actions as necessary
- Equipment inventory and tracking
- Managing employee discipline
- Safety messaging
- Ensure representation for all classes of front-line employees on appropriate employee safety committees.

The Director of Mobility Services and Alternative Modes and team of Managers are responsible for:

- Managing safety in all departmental functions, including appropriate hazard identification, analysis and mitigation, and safety assurance on those mitigations
- Supporting SMS system-wide, including investigations, audits, and assessments
- Training, assigning, and monitoring paratransit operators, reservationists, supervisors, dispatchers, and support staff in support of safe delivery of paratransit services
- Maintaining, reviewing, and revising applicable sections of the Rulebook in coordination with the CSSEM
- Implementing rules compliance programs for staff and ensuring service quality assurance and quality control
- Reporting key performance indicators, operational data and other performance measures associated with daily tasks and activities to appropriate parties
- Investigating and managing customer complaints and taking corrective action as necessary
- Investigating employee reports of hazards and taking corrective actions as necessary
- Safety messaging.

Bus, Rail, and Paratransit Communications

Safety-critical activities are described below:

- Control of employee sign-in, attendance procedures, run assignments, yard supervision, and discipline in accordance with agency rules and procedures
- Conduct of visual fitness-for-duty checks upon operator sign-in for duty
- Dissemination of safety-critical drivers' alerts and other notices
- Managing and directing control center operations and safety
- Responding to and managing of operational emergencies and incidents in coordination with the Safety Department and other departments
- Dispatching (respective) operations supervisors and other staff to incidents and accidents as necessary, and closely coordinating with Safety Department in connection with events
- Internal safety messaging.

Operations Training

The Manager is fully responsible for SMS compliance in the development and delivery of training—including new-hire, mandatory (annual) refresher, and post-accident training—for transit operations personnel. The training department's direct involvement in new-hire training for maintenance employees is typically limited to vehicle operation and defensive driving per company standards, while additional hands-on training is carried out within the corresponding maintenance division.

The Manager of Operations Training performs the following safety-critical activities:

- Development and delivery of official agency training curricula materials, including for safety-critical positions, tasks, activities, processes, methods, and programs
- Safety training program development and quality assurance
- Monitoring of training records and oversight of final training evaluations
- Training needs assessments in consultation with other Operations departments and in alignment with agency procedures
- Post-accident re-training based on deficiencies or non-compliances found during accident/incident investigations by Operations and/or Safety
- Simulator training
- Quality assurance evaluations ("ride evaluations" or "ride checks") and follow-up coaching with operators as necessary
- Rail operator re-certification or similar, formally required refresher training (currently in development)
- New-hire training for Operations employees on SMS principles, including hazard identification and reporting

Chief Asset Management Officer

Maintenance (All Modes)

Under the direction of the CAMO, Maintenance Divisions for all assets (vehicles, infrastructure, facilities, and equipment) are responsible for the following safety-critical activities:

- A. Transit Asset Management
- B. Maintenance Training
- C. Warranty Programs
- D. Preventative and Corrective Maintenance
- E. Work Orders and Documentation
- F. Materials Management
- G. Maintenance Quality Assurance
- H. Specialized Maintenance Training

Safety-critical activities for these areas are described below.

- Ensuring proper training of all new mechanics and technicians to safely and effectively inspect, maintain, and repair the agency's assets
- Training all maintenance staff in emergency/safety procedures and injury and illness prevention as appropriate, in coordination with the Safety and Emergency Management Departments
- Administering warranty programs for rolling stock and equipment
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Administering and monitoring standardized programs, policies, and procedures, and respective Maintenance Plans
- Supporting investigations of safety incidents and accidents as requested by the Safety Department
- Coordinating with the Safety Department and other stakeholders in the development of design specifications for, and formal acceptance of, new (revenue and non-revenue) vehicles and vehicle-borne, safety-critical systems
- Assuring that materials, supplies, equipment and parts under the care and custody of the area are stored, accessed and distributed safely and appropriately according to RTA procedures
- Coordinating with the CSSEM on safety requirements of materials
- Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
- Approving (jointly with the CSSEM) and implementing the RTA Safety and Health Handbook which establishes OSHA-compliant policies, procedures, and rules for workplace safety.

Specifically, for Rail Infrastructure Maintenance (Including Maintenance-of-Way, or MOW, and Traction Power)--

- Assuring that rail infrastructure is properly maintained and available in safe

- operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Implementing the agency's Roadway Worker Protection program to ensure employee and contractor safety along the entire streetcar trackway
- Administering and monitoring standardized programs, policies, and procedures, and the Rail Maintenance Plan
- Supporting Safety Department-led accident/incident investigations as
- Monitoring safe handling of and minimizing employee and environmental exposure to potentially hazardous products and materials.
- Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner
- As appropriate, coordinating the development and testing of engineering solutions as a means of addressing infrastructure-related hazards
- Serving as liaison with various municipalities and other external agencies for hazard resolutions involving infrastructure

Specifically, for Maintenance Quality Assurance--

- Ensuring all documentation requirements of maintenance activities are fully implemented in conformance with regulations and the requirements of the SMS
- Where applicable, participating in the development of technical equipment specifications and procedures that address the safety requirements of regulatory agencies and RTA
- Ensuring that replacement equipment and modifications meet safety requirements prior to acceptance, installation or implementation
- Examining equipment and systems to explore the potential for increased efficiencies and improvements in safety as well as in performance
- Coordinating major equipment rebuild, repair, and retrofits
- Monitoring the performance of preventive maintenance efforts and all other contractor activities
- Ensuring there are no unauthorized modifications to vehicles and equipment

The Maintenance Department is responsible for developing and delivering certain training, directly, for its personnel. The specific training that an employee receives is based on their position description. Maintenance performs the following activities in this regard:

- Development and delivery of official agency training curricula materials, including for safety-critical positions, tasks, activities, processes, methods, and programs that are specific to Bus, Rail, and Paratransit Maintenance areas.
- Safety maintenance training program and development and quality assurance
- Create Standardized Maintenance Procedures (SMP)
- Monitoring and oversight of maintenance training records including evaluation of the effectiveness of the overall training program
- Training needs assessments in consultation with Safety and in alignment with agency procedures
- Quality assurance evaluations (standardized maintenance procedures, etc.) and

follow-up coaching with technicians, as necessary.

Facilities Maintenance Safety-critical Activities:

- Assuring that facilities are properly maintained and accessible in safe operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Administering and monitoring standardized programs, policies, and procedures, and the Facilities Maintenance Plan
- Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner
- Assuring compliance with local, State, and Federal environmental protection and hazardous waste requirements.

Fleet Advancement

The Director of Fleet Advancement and their team are responsible for:

- Assuring that all vehicle fleet technology hardware is properly maintained and available in safe operating condition according to RTA's procedures
- Providing necessary mechanisms for reporting defects and hazardous conditions
- Administering and monitoring standardized programs, policies, and procedures, and the Vehicle Maintenance Plan
- Ensuring appropriate action to resolve reported or otherwise identified hazards in a timely manner. As appropriate, coordinating the development and testing of engineering solutions as a means of addressing vehicle-related hazards

Specific to fleet technology—

The team is responsible for maintaining in-vehicle technologies including fare collection equipment, audio/video surveillance equipment, CAD mobile units, Public Address (PA) systems, and two-way radios.

Transit Stop Maintenance

The Transit Stop Manager develops, manages, and administers all aspects related to streetcar and bus stop maintenance, the stop inventory database, temporary relocations or closures, improvement projects related to asset management and ADA compliance. The Transit Stops Manager also assists the Director of Facilities by managing several contracts for stop maintenance functions, ensuring compliance with contract terms relating to shelter maintenance, cleaning, repair, and security. The position performs the following safety-related tasks:

- Manages all property landscaping, trash removal, amenity state of good repair, and facility repairs
- Manages the installations, removals and operational maintenance of all RTA shelters and associated amenities
- Manages all vendors involved with the maintenance of RTA assets including but not limited to shelters, benches, and trash pickup

- Coordinates with City of New Orleans on trash collection at bus and streetcar stops and provides recommendations to improve and streamline services
- Proposes shelter placements and types in accordance with RTA guidelines
- Assists in the development of specifications and guidelines related to stops and shelters
- Manages customer complaint resolution and questions. Develops and manages bus and streetcar operator feedback.
- Creates and maintains a master transit stop inventory for RTA Operations and Infrastructure departments for use by the staff using data from automatic passenger counters and scheduling software. (Planning and Scheduling determines locations and requirements and secures permitting for signs and shelters.)

Chief of Planning and Capital Projects

The CPCP has the responsibility for and oversight of the following areas:

- A. RTA's Capital Plan
- B. Project Delivery and Oversight
- C. Safety and Security Certification/Acceptance and the SSCP
- D. Service Planning and Scheduling
- E. Information Technology (IT)

Capital Project Delivery and Oversight

As required, the Capital Projects team may be assisted by a Program Management Consultant, Construction Management Consultant, General Architectural and Engineering Consultant, and/or other contractors.

The Director of Capital Projects will ensure that all contractors and consultants comply with the provisions of this ASP.

The SSC/Acceptance process is an important SA activity that is carried out jointly by the Safety and Capital Projects teams and is governed separately by the SSCP. The SSCP is developed, maintained, and implemented jointly by the CPCP and CSSEM. Depending on the scope, complexity, and initial risk assessment associated with each project, the Project Manager (as tasked by the Director of Capital Projects) and Safety Department staff follow the guidelines contained in the SSCP to determine whether a capital project or system modification requires SSC or Acceptance, and to what degree. Projects and system modifications are also jointly reviewed through a Management of Change procedure. (Also see 3.6.1 Safety and Security Certification.)

Service Planning and Scheduling

The Service Planning and Scheduling team performs the following safety-critical activities:

- System route analysis
- Scheduling and run-cutting for all fixed routes
- Station locations and amenities
- Accessibility issues regarding RTA facilities and bus stops
- Community outreach

A responsibility of the Service Planning and Scheduling team that supports RTA's Management of Change processes is to incorporate a safety risk management review into the service pick process, to ensure that hazards and accident/incident trends are taken into consideration. This review process is iterative throughout the year but at a minimum consists of a coordination meeting with the Safety Department at a point during each service pick that allows for minor adjustments to be made, as necessary, prior to commencement of service. Other, long-range mitigations recommended by the Safety Department during this coordination may be addressed through other steps pursuant to its Service Standards SOP. If necessary (based on the associated level of safety risk), the CSSEM formally tracks long-range mitigations to completion, through either Mitigation Monitoring Plans or CAPs.

Additionally, for phased implementation of large transit network redesign projects, the Director – Service Planning and Scheduling engages Operations supervisors and training instructors, as well as Safety Department representatives, to conduct joint assessments of bus and streetcar routes. The topics reviewed during these assessments may include any combination of: schedule (times of day), service frequency (headways), route alignment, vehicle dynamics, interface with signals or other components of the street network, and placement of transfer points or hubs.

Information Technology

Information Technology (IT) activities and systems require continuous management of risk and are safety-critical. IT is responsible for installing, maintaining and replacing hardware, firmware and software; investigating new technologies, and supporting agency-wide information management and protection.

IT provides and supports the following safety-critical areas and activities:

- Development and promulgation of IT policies, procedures and standards
- Desktop computer access
- Network access
- Telephone systems
- Applications
- Notification of system outages for internal and external customers
- Data warehousing
- Computer-Aided Dispatch (CAD) and Clever Devices tools for OCC
- Maintenance Management Information Systems
- Risk and vulnerability assessments of IT systems agency-wide
- Security badging hardware, software, and equipment

- Hardware and software for audio/video equipment
- Instructional services for use and protection of information technology systems and processes

IT also manages several contract employees and vendors. IT is responsible for providing safety management oversight of these contractors and vendors, including compliance with this ASP.

Chief Financial Officer

Safety-critical activities for Financial Operations are related to the provision of accurate and timely financial services to stakeholders while fostering accountability. One of its primary functions is keeping the Accountable Executive informed of resource allocation and availability in the service of safety management.

A function reporting to the CFO, the Office of Internal Audit and Compliance, is responsible for conducting the Internal Safety Management Audit (ISMA) of the Safety Department.

The Chief Financial Officer has the responsibility for the following areas:

- A. Budget Development and Administration
- B. Grants Administration
- C. Procurement
- D. Third Party and Internal Audits
- E. DBE Compliance
- F. Revenue Collection
- G. Accounting

Procurement

RTA's Procurement Director reports to the CFO and is fully responsible for SMS compliance in the Procurement area.

The primary safety management activities of procurement are to ensure that safety principles, requirements and representatives are included in the procurement process. In coordination with, or at the direction of, the CSSEM, the Director assesses the level of safety risk associated with procurements. Additionally, safety must be managed in storage, warehousing, transportation, accounting, distribution, and disposal of all assets managed through the department. This includes ensuring that information acquired in the procurement process is effectively communicated to the end users.

Office of Internal Audit and Compliance (OIAC)

The RTA's Office of Internal Audit and Compliance (OIAC) functions under the oversight of the CFO and partners with the Safety Department to enhance and ensure the safety, cataloguing, development, and monitoring of internal processes.

The OIAC's principal responsibilities in safety management include ensuring the RTA's compliance with current FTA safety standards, conducting internal safety audits and compliance checks, and devising and executing the RTA Annual Audit Plan, which may incorporate safety-related assessments. For more details on the OIAC's role in supporting safety management, refer to SOP 004-100 (Procedure for Performing Internal Safety Management Audits).

Chief of External Affairs

Customer Service

The Manager of Customer Service (consisting of “Rideline” and “ADA” or “eligibility” teams at present) has the responsibility for the following safety-critical activities:

- Oversight, monitoring, and supervision of the customer service team
- Monitoring and ensuring proper handling of consumer complaints, suggestions, commendations, miscellaneous calls and correspondence relating to the agency
- Investigating complaints and concerns, employee reports of hazards and other required events, including coordination with other departments and preparing reports as necessary
- Collecting and performing trend analysis on customer and employee reports, concerns, and complaints
- ADA and reduced fare program eligibility and customer relations
- ADA compliance

Intergovernmental Affairs

The Intergovernmental Affairs team has the responsibility for the following safety-critical activities:

- Community and government relations for RTA issues and operations
- Outreach to community organizations/stakeholders.

Marketing and Communications

Marketing and Communications is responsible for public relations, marketing and retail sales, streetcar charters, advertising, film production and creative services. The team also designates individuals to serve as RTA's Public Information Officer (PIO) under RTA's All Hazards Plan and related annexes.

Chief of Human Capital and Workforce Development

RTA's Chief Human Capital and Workforce Development (HCWD) Officer reports to the Accountable Executive. The Chief HCWD Officer is fully responsible for SMS compliance in the HCWD area.

The Chief HCWD Officer manages hiring, employee information, worker's compensation, administrative organizational development, and employee programs. HCWD is responsible for assuring that staff positions are effectively defined and classified and that qualified personnel are identified to meet staffing needs. This department also manages the contracted employee assistance programs, including the program for substance abuse. This department also administers and oversees the Workers Compensation and Drug and Alcohol Programs in accordance with federal and state requirements.

Safety-critical activities include:

- A. Talent Acquisition
- B. Employee Relations
- C. Talent Management
- D. Compensation
- E. Benefits
- F. Employee Assistance Program (EAP)
- G. Equal Employment Opportunity (EEO) Compliance
- H. Document Management
- I. Worker's Compensation matters
- J. Drug and Alcohol Program

Safety Critical activities in this area include:

- Coordinating of safety-critical pre-employment activities, including investigations, testing, DOT physicals, qualifications review and legal compliance in hiring
- Maintaining job descriptions incorporating SMS responsibilities and requirements; distribution of the descriptions as needed
- Accurately documenting hiring and other employment processes
- Managing recruitments based on direction from ELT and approved criteria
- EAP, including wellness services, including nutrition, injury prevention, financial counseling and physical and mental health
- Developing, implementing, and monitoring the Drug & Alcohol program in accordance with U.S. DOT and FTA requirements
- Investigating complaints and incidents related to conduct in the workplace and recommending corrective actions as necessary
- Maintaining centralized training records for the agency, including but not limited to: ethics training, FEMA ICS training, attendance of mandatory safety meetings, and SMS training.

1.2.3 Key SMS Personnel with Direct Responsibility for Rail Fixed Guideway Safety Oversight

Apart from the level- and function- specific SMS responsibilities described above, certain key SMS personnel [49 CFR Parts 673.23(d)(4) and 673.29] are considered to have a direct responsibility for safety oversight of the rail fixed guideway, and as such, must comply with FTA's Public Transportation Safety Certification Training Program

(PTSCTP) codified at 49 CFR Part 672. As of the adoption of this revision of the ASP, the key SMS personnel are:

- CSSEM
- All Safety Department and Emergency Management Department staff

The Safety Department, under the CSSEM's direction, coordinates a review of the status of required training per the PTSCTP during the annual review and revision of the ASP. The CSSEM maintains a safety training matrix for the key SMS positions and pursues external training opportunities in support of meeting these training needs by the specified compliance dates, to the extent practicable, e.g., FTA, Transportation Safety Institute (TSI), the National Safety Council.

Key SMS personnel are responsible for complying with PTSCTP and internal SMS training requirements, including refresher training every two years. (Also see **4.1 Competencies and Training.**)

1.3 Integration with Emergency Management

RTA develops, maintains, and implements all emergency management documentation as required by 49 CFR Part 673.11(a)(6), hereby incorporated by reference. Jurisdictional agreements, including Memoranda of Agreement/Understanding (MOU/MOA), are also maintained by RTA.

Emergency Management functions are subject to the requirements of Section II of this ASP, Safety Risk Management. Corrective actions arising out of emergency management functions, including drills, workshops, exercises, and After Action Reports, are the responsibility of the CSSEM unless otherwise noted in the CAP.

The CSSEM ensures that resources are properly allocated to support emergency management functions in a manner that achieves SMS goals and objectives and addresses any SMS deficiencies. The CSSEM uses SMS Steering Committee and/or ELT meetings and proceedings to ensure a strong level of cross-departmental coordination on emergency management matters. Additionally, the CSSEM participates in and leads coordination meetings with City/regional stakeholders to discuss upcoming activities or initiatives, such as training, joint exercises, and external outreach campaigns.

The documentation listed below specifies primary agency-wide documents to manage emergency management functions, although this list is not exhaustive:

1. RTA All Hazards Plan and annexes
2. Memoranda of Understanding/Agreement with law enforcement and emergency management partners
3. Emergency Exercise Plan
4. After Action Reports

1.4 SMS Documentation

Per the requirements of 49 CFR Part 673.31, RTA maintains all documentation incorporated here by reference for at least three years, in all versions, and will make them available as requested or required to the SSO, the FTA or other federal agencies having jurisdiction and authority. Other documents subject to other statutory compliance requirements (industrial safety, environmental, etc.) will be maintained according to law.

The CSSEM coordinates with each ELT member to identify and address process deficiencies or documentation gaps in their respective area(s) through a combination of the following: Safety Department-led Safety Assurance activities, SMS Steering Committee meetings, ISMAs, strategic planning coordination, and one-on-one workshops.

Documents that have a direct interface with this ASP are listed in APPENDIX D: LIST OF SAFETY POLICIES AND STANDARD OPERATING PROCEDURES. The list is for reference only and is not exhaustive.

An up-to-date list of controlled, final versions of safety procedures is maintained on the “SMS” drive and are available upon request. Current versions of agency policies are maintained on the RTA Intranet site, in accordance with the “Creation of Policy” Policy (HC49).

At present, a formal, agency-wide process for developing, reviewing, updating, and maintaining procedures is under development.

Section II: Safety Risk Management

Under the requirements of 49 CFR Part 673.25(a), transit agencies must develop and implement a Safety Risk Management (SRM) process for all elements of the system.

RTA's formal SRM process incorporates all FTA requirements to: identify existing and foreseeable hazards, identify reasonable consequence(s) of those hazards that may result in adverse events, analyze those consequences to evaluate the level of safety risk, and establish and prioritize mitigations to reduce the level of safety risk to the lowest practicable level.

SRM encompasses the use of safety analysis tools by adequately staffed and trained personnel and departments, groups and committees at RTA, as well as the use of SMEs wherever appropriate, at the discretion of the CSSEM.

In addition, the SRM process at RTA is integrated with its SA program to ensure that safety risk mitigations are evaluated for effectiveness over time. SA processes are described in Section III.

2.1 Infectious Disease Hazards

Pursuant to statutory requirements in Title 49 U.S.C. Section 5329(d) as amended by the Bipartisan Infrastructure Law, the SRM process is applied to identifying strategies to minimize the exposure of the public, personnel, and property to hazards and unsafe conditions. To the extent that any hazards are associated with known infectious diseases, any SRM actions will be carried out in a manner that is consistent with guidelines of the Centers for Disease Control and Prevention (CDC) and/or state/local health authorities. Note: The approval of this ASP constitutes as RTA's certification that the SRM measures outlined, below, and generally, RTA's Safety Program, include strategies to minimize the exposure of the public, personnel, and property to known infectious disease hazards, that are consistent with guidelines of CDC and state/local health authorities. More information on how the RTA manages Infection Diseases can be found in Annex B: Infectious Disease Annex in the RTA's All Hazard Plan.

2.2 Hazard Identification

All department managers are required to identify hazards, report them, and mitigate them appropriately. All employees and contractors share a responsibility to identify and report hazards using a variety of methods established by RTA. To ensure proper recordkeeping as required by FTA and SAF3, department managers are responsible for providing regular updates to the Safety Department regarding hazards and mitigations taken.

2.2.1 Hazard Identification Sources

There are a variety of sources for hazard identification. RTA uses the following sources for hazard identification:

1. Reactive hazard identification involves analysis of events or outcomes that have already occurred. Hazards are identified through investigation of safety occurrences (including close calls), adverse events and hazard reporting from the field (such as rules compliance activities, safety committee meetings and customer reports) where adverse outcomes have been experienced in the system.
2. Proactive hazard identification involves real-time situations, such as through departmental inspections, audits, evaluations, observations, and assessments; proper management of change; training quality assurance programs; and the employee and contractor safety reporting programs. Job Hazard Analyses (JHA) identify and support a thorough analysis of hazards that may reasonably be encountered during the performance of a specific job or task. RTA actively seeks to identify hazards and mitigate them effectively before adverse events occur.
3. A specialized subset of proactive hazard identification is predictive identification, which involves the thorough and timely analysis of safety data collected by all departments to identify possible negative future outcomes or events; as well as monitoring the system in real time.
4. FTA and SSO data and information as required by 49 CFR Part 673.25(b)(2), as well as industry experience, best practices, and lessons learned.
5. The Safety Department reviews Board of Commissioners and Riders Advisory Council meeting minutes for reported hazards and safety concerns. Hazards are elevated to the master Hazard Log as appropriate, based on safety risk.

2.2.2 Employee Reporting Systems

RTA has multiple avenues by which employees and contractors can report hazards. Investigations of hazards are also properly documented per SOP #004-005 and distributed according to that SOP.

Employees are encouraged to report hazards through their chain of command, including their immediate supervision, or management if supervision is not available; through the safety committee process; or by contacting the Safety Department directly.

Frontline Operations Department personnel also have the option of reporting the hazard to OCC, who will in turn input the proper information in Clever Incident Manager.

RTA employees and contractors can also submit hazard information via a Safety Hotline, which has the following options:

- Telephone – (504) 827-8367 (available 24 hours a day, 7 days a week)
- Email – safetyhotline@rtafoward.org
- Vorex “Help Desk” application (accessible via the RTA Intranet)
- Hazard Report Form (employees can submit the form to any of three labeled drop boxes: A. Philip Randolph (Canal) facility, Carrollton, or East New Orleans)

(ENO)).

Submitters have the option of reporting anonymously or confidentially to the Safety Hotline.

Designated Safety Department staff enter, track, monitor, analyze, and close hazards, or “tickets” through a cloud-based software application, “Vorex.” This tool is convenient for staff to use and provides for increased trend analysis capabilities.

Customer Service manages customer safety complaints, which are forwarded to the responsible department and the CSSEM as applicable. The department investigates the report and develops and implements corrective action as needed, in coordination with the Safety Department. Employees can also use this process as an anonymous option.

No matter what the source of information is or which department investigates and resolves the issue, the feedback loop to the reporting employee is required, as applicable. For hazards or issues that are deemed “unacceptable” following the SRM process, the outcome of the report, investigation, corrective action, or mitigation is distributed to the SMS Steering Committee for handling as appropriate. Each report will be thoroughly investigated under the direction of the CSSEM and in accordance with SAF3 and this ASP. If the employee has not reported anonymously, the responsible (Technical or Executive Level) manager or CSSEM ensures that the results of the investigations and any corrective action are reported back to the reporting employee.

In turn, the results are forwarded to either a “Safety Ambassador” or Departmental Safety Committee (or if neither is available, to the department management for local dissemination). (Also see Section IV – Safety Promotion.)

Protections for Employees Reporting Adverse Safety Conditions

RTA is committed to maintaining a robust positive safety culture. As part of that commitment, RTA will protect employees who report adverse safety conditions to management. As explicitly directed in SAF3, any employee who reports a valid violation, unsafe act or condition, or other safety concern directly to the Safety Department will not experience any reprisal from management. SAF3 also stipulates that such reprisal is not allowed if reported to any (other) member of (Technical or Executive Level) management. The CSSEM will promptly forward to the Chief HCWD Officer any allegations or claims that this provision in SAF3 was violated during the handling of an employee-reported hazard or safety concern. If an employee reports and requests anonymity, the RTA will provide anonymity for all valid concerns.

Unprotected Self-Reporting

No willful violations will be subject to self-reporting protections. This includes but is not limited to any violations of Drug and Alcohol policies or requirements, criminal acts, or

failure to report any criminal acts immediately.

2.2.3 Hazard Investigation

Hazards are investigated in each department as they are reported or identified. Department management identified in this ASP (or, alternatively, the department's Safety Ambassador) are considered primary points-of-contact and initial investigators ("investigator"). If necessary, the investigator may route the investigation to the Safety Department for additional technical support in accordance with SOP #004-005. All investigative activities are properly documented according to the SOP.

In consultation with the Safety Department, the investigator first analyzes the hazard by identifying potential consequences. The purpose of investigation is to evaluate each hazard in terms of the level of safety risk associated with the worst credible outcome; and to examine the likelihood and severity of those consequences occurring. The worst credible consequence is defined as what the agency expects to be a realistic and imaginable consequence of the hazard.

RTA defines safety risk severity categories as a qualitative measure of the worst credible outcome, as indicated in Table 1.

Category	Description	Severity Definitions
1	Catastrophic	Could result in one or more of the following: death, permanent total disability, irreversible significant environmental impact, or monetary loss equal to or exceeding \$10M.
2	Critical	Could result in one or more of the following: permanent partial disability, injuries, or occupational illness that may result in hospitalization of at least three personnel, reversible significant environmental impact, or monetary loss equal to or exceeding \$1M but less than \$10M.
3	Marginal	Could result in one or more of the following: injury or occupational illness resulting in one or more lost workday(s), reversible moderate environmental impact, or monetary loss equal to or exceeding \$100K but less than \$1M.
4	Negligible	Could result in one or more of the following: injury or occupational illness not resulting in a lost workday, minimal environmental impact, or monetary loss less than \$100K.

Table 1: Safety Risk Severity (Adapted from Table 2-4 from Rail Transit Agency Accident Investigations – Background Research, FTA⁶)

RTA defines safety risk likelihood, or probability, as a measure of frequency relative to any of: a unit of time, the duration of an activity, the life of an item, or the life of a total fleet/inventory, as indicated in Table 2.

Frequency	Level	Probability Definitions
Frequent	A	Likely to occur frequently to an individual item. Continuously experienced in the fleet inventory.
Probable	B	Will occur several times in life of an item; will occur frequently in fleet/inventory.
Occasional	C	Likely to occur sometime in life of an item; will occur several times in fleet/inventory.
Remote	D	Unlikely, but possible to occur in life of an item; unlikely but can be expected to occur in fleet/inventory.
Improbable	E	So unlikely, it can be assumed occurrence will not be experienced to an individual item; unlikely to occur but possible in fleet/inventory.

Table 2: Safety Risk Likelihood

Staff may use either inductive or deductive evaluation methods, depending on circumstances to determine ratings for severity and likelihood.

2.3 Safety Risk Assessment and Prioritization

Safety Risk assessment and prioritization criteria are established through the process documented in this section. All official risk assessment and prioritization activities and any required actions developed as a result of assessments, will be led by the CSSEM, investigator, or other designee who is trained and qualified to perform such assessments. Once the severity and likelihood of the worst credible outcome have been established, the Safety Risk Index (SRI) can be calculated; i.e., the level of safety risk as a composite of severity and likelihood of the potential consequence of the hazard (Table 3).

⁶ [Rail Transit Agency Accident Investigations - Background Research, last updated July 2022](#)

SAFETY RISK INDEX				
Frequency of Occurrence	1	2	3	4
A	1A	2A	3A	4A
B	1B	2B	3B	4B
C	1C	2C	3C	4C
D	1D	2D	3D	4D
E	1E	2E	3E	4E

Table 3: Safety Risk Index

The SRI and safety risk acceptance criteria (Table 4) are reviewed to determine “acceptance” of the increased level of safety risk that was assessed—or that which will exist if left unmitigated. This level of safety risk acceptance is classified as one of the following: high, medium, low, or acceptable. At this point in the process, any assessment resulting in an SRI of low, medium, or high must be reported to the Safety Department. The CSSEM or designee will advise the investigator or department point-of-contact on next steps.

For acceptable hazards, the investigator or department point-of-contact is responsible for documenting the safety risk assessment.

For low, medium, or high hazards, the CSSEM or designee is responsible for determining the SRI and using it to establish a shared understanding across the affected department(s) and/or functional area(s) of the necessity to mitigate or reduce the level of safety risk. The CSSEM determines whether the assessed level needs to be prioritized based on safety risk acceptance.

For hazards/consequences rated high or medium, the SSO must be notified as soon as practicable or no later than the conclusion of the safety risk assessment. The CSSEM is directly responsible for notifying the SSO.

SRI	Acceptance Criteria	Special Conditions	Approval Level
High	Unacceptable	Requires immediate resolution. Results must be recorded on Safety’s Hazard Log and immediately reported to SMS Steering Committee*	CEO, CSSEM
Medium	Undesirable	Actions require SMS Steering Committee and CSSEM review and approval. Results must be recorded on Safety’s Hazard Log*	CSSEM

Low	Acceptable with Review	Requires dept. management review in consultation with CSSEM or designee. Results must be recorded on dept. Hazard Log and managed by investigator or dept. POC, with follow-up provided to CSSEM as directed	Dept. ELT
Acceptable	Acceptable	None – Can be managed at department-level. Investigator or dept. POC is responsible for recordkeeping. Safety may audit dept. Hazard Log	Dept. Investigator/ POC

Table 4: Safety Risk Acceptance Criteria

If the hazard is currently mitigated, investigation involves an assessment of the effectiveness of current mitigations—that is, a determination of whether they are sufficient to address the associated risk, and if changes or additional mitigations are warranted to further reduce risk (until it reaches an acceptable level).

Based on the approved decision authority level that results from the safety risk assessment—unacceptable, undesirable, acceptable with review, or acceptable—the department performing the assessment is responsible for notifying the appropriate parties immediately, if they are not already involved. If the ELT must be notified, the CSSEM may recommend calling an emergency meeting of the ELT and/or SMS Steering Committee as appropriate.

2.4 Safety Risk Mitigation

Safety Risk Mitigations are methods or processes to manage safety risk agency-wide. Once an unacceptable level of safety risk is assessed, RTA must ensure that it is not accepting the risk without the proper level of management involvement, per the SRM process specified in this ASP.

Strategic decisions are made to ensure that risk is reduced to the lowest practical level. The risk mitigation strategy in place at RTA follows FTA guidance:

- **Avoid:** Avoidance removes the undesired consequence, such as canceling or delaying the operation or activity until risk is appropriately mitigated.
- **Reduce:** Risk reduction is the application of mitigations to reduce probability or severity to an acceptable level. It is noted here that it is rarely possible to reduce severity without engineering or operational configuration changes (such as speed reduction).
- **Segregate:** Segregation limits the exposure of people, assets, operations or activities to the consequences of the identified hazards.

The preferred hierarchy of mitigation at RTA, based on FTA guidance, is:

1. Design out the hazards
2. Install safety devices

3. Use warning systems
4. Administrative (rules, procedures, training)
5. Personal Protective Equipment (PPE)

Each level of employee has specific responsibilities in response to hazards.

Front-line employees (and contractors) are trained to recognize hazards, report them and what activities are required of them for mitigation, such as corrective maintenance, avoidance of collisions, stop hazardous work, use of PPE, rules compliance, use of Incident Command, setting up barriers, etc.

Technical managers must respond to and investigate hazards, deploy resources at their disposal to address and mitigate hazards under their control; and when additional resources or assistance are needed, inform executive management and/or the Safety Department in a timely manner.

Executive management must allocate resources based on risk (as determined by or in consultation with the Safety Department), and if resources are not available, ensure that no activities take place until the level of safety risk is mitigated to an acceptable level (as determined by the Safety Risk Acceptance Criteria table).

If risk needs to be mitigated beyond existing mitigations, or when new hazards are identified that require corrective action, a mitigation must be developed, implemented, and monitored. The CSSEM will advise whether a CAP is required to facilitate the necessary actions to mitigate the safety risk to an acceptable level. The CSSEM will monitor mitigations and corresponding CAPs to ensure consistency and compliance with the ASP. CAPs are submitted electronically to the SSO by the CSSEM for approval once the CAP is opened. Not all mitigations require a formal CAP be submitted to the SSO.

Safety risk assessments, prioritizations, mitigations, and corresponding CAPs for high and medium SRI-rated hazards will be reviewed jointly in the SMS Steering Committee. These details for low and acceptable SRI-rated hazards may be discussed at this or other, recurring safety committee meetings, at the discretion of the CSSEM.

Risk still inherently exists even after mitigation; the department is responsible for monitoring the mitigation, in coordination with the CSSEM or designee, and promptly reporting if the mitigation is ineffective or introduces unintended hazards. The CSSEM will advise the department whether a Mitigation Monitoring Plan (MMP) is required, and if so:

- What level of documentation is sufficient and how it should be provided to the CSSEM,
- Who is responsible for implementing the MMP, and
- What should be entailed in the monitoring.

(Also see Section III – Safety Assurance.)

2.5 Tracking

The department identified as having tracking responsibilities in Table 4, above, must document all SRM activities associated with each hazard and provide regular status reports to the CSSEM or to the corresponding safety committee, as appropriate. Using these reports as well as the official Safety Department Hazard Log, Department Hazard Log, and other documentation, the CSSEM tracks mitigations/CAPs to ensure that no unacceptable risk is assumed due to error or omission and ensures that any associated CAPs are developed and reported to the SSO as required.

The official Hazard Log contains one sheet with all hazards whose assessed SRI meet either the high or medium threshold as well as hazards rated lower but requiring follow-up and cross-departmental coordination. A second sheet shows hazards that are rated either low or acceptable.

The Log is reviewed by the SMS Steering Committee during regular, quarterly meetings and is also discussed during regular coordination meetings between the CSSEM and SSO.

The following fields of information are provided in the Hazard Log:

- ID number
- Hazard description– refers to a brief narrative summary of the hazard – what it is; where it is located; what elements it is comprised of element of RTA’s operation affected by the hazard
- Date identified
- Hazard source– indicates the mechanism used to identify the hazard, e.g., operator report, near-miss, accident investigation, internal safety management audit, rules compliance program, facility/equipment inspection, formal hazard analysis
- Safety Risk Index (SRI)- whether assessed by the department with support from the CSSEM or by the Safety Department directly
- (Recommended) Hazard Resolution/Mitigation/CAP– refers to the actions recommended by RTA to address the hazard and bring it into a level of risk acceptable to management
- Status– refers to the status of the recommendations. Status may be designed as pending, open, in progress, or closed.

2.6 Risk Reduction Program

Pursuant to Title 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law, RTA’s SRM and SA processes comprise a “Risk Reduction Program” that will, in connection with other ongoing strategies and initiatives to improve employee and patron safety, aim to reduce the number and rates of accidents, injuries, and assaults on transit workers, including but not limited to the following, specific event types:

- Bus collisions (with vehicles and pedestrians);

- Assaults on transit workers.

RTA will continue to review guidance and forthcoming regulations in connection with Section (l) of the statute, which now includes the exploration of specific mitigations regardless of the outcomes of any SRM process. Namely, based on the language contained in the Bipartisan Infrastructure Law, the mitigations that RTA considers must include retrofits of bus fleets to reduce visibility impairments and the installation of operator barriers. Note: RTA's entire fixed route bus fleet has either factory-installed or retrofitted operator barriers as a result of an FTA grant.

At present, while the statute refers to "risk reduction performance targets," there are no changes to the NSP that can be used to establish baselines for these two event types, and therefore, FTA is not requiring that such targets be included in this ASP.

Section III: Safety Assurance

Safety Performance Monitoring and Measurement

RTA has established activities to:

- Monitor the RTA system for compliance with, and sufficiency of, the agency's procedures for operations and maintenance;
- Monitor RTA operations to identify hazards not identified through the SRM process (per 49 CFR Part 673.25);
- Monitor RTA operations to identify any safety risk mitigations that may be ineffective, inappropriate, or were not implemented as intended;
- Investigate safety events to identify causal factors; and
- Monitor information reported through any internal safety reporting programs.

Safety Assurance (SA) is a continuous process, constantly interacting with SRM. It is a set of systematic, ongoing processes that are both led and facilitated by the Safety Department to monitor system safety performance. This monitoring is used to: verify that safety objectives are being met; identify previously unforeseen hazards; ensure that mitigations in place are effective and not creating new hazards; and collect data on safety that can be analyzed, trended and shared in support of continuous improvement of the SMS. In addition, SA activities assist the agency in identifying and correcting practical drift and in establishing appropriate safety performance measures and SPTs.

The CSSEM is responsible for ensuring SA processes are compliant with 49 CFR Part 673 and are effective.

In accordance with FTA requirements for Labor-Management Safety Committees, the Labor-Management Safety Committee (LMSC) members may bring forth any safety risk mitigation which they believe to be ineffective or not implemented as intended, during any regular meeting.

3.1 Safety Data Analysis

Under SAF3, RTA departments must identify, collect and analyze data on their safety critical functions in close coordination with, and at the direction of, the CSSEM or designee.

Sources of data at RTA include, but are not limited to:

- Employee reporting systems, including self-reporting
- Field reports and observations from supervision and managers
- Preventive maintenance and other scheduled inspections
- Results from drills and exercises, and critical incident debriefings from actual emergency events

- ISMAs and SMS implementation documentation
- Quality assurance and quality control inspections, audits and other activities
- Employee, passenger and public reports of injury
- Planning and scheduling data collection
- Key performance indicators
- Accident and incident Investigation reports
- NTD data collection and reporting
- Drug and alcohol compliance programs
- Rules and procedures compliance activities
- Safety committee activities and reports

Each department submits its data as related to safety performance and mitigation monitoring, to the executive in its area for review and verification. The CSSEM may request this documentation as part of the agency-wide S A effort. Executives are expected to discuss data and safety performance at SMS Steering Committee meetings as appropriate. Safety performance data are also reviewed by the RTA Board of Commissioners at their request.

3.1.1 Risk-Based Inspections (LADOTD)

Pursuant to FTA Special Directive 22-32⁷ and the requirement in 49 U.S.C § 5329 (as amended by the Bipartisan Infrastructure Law) for LADOTD to conduct “risk-based inspections” of RTA’s rail system based on data collected and furnished by RTA. RTA coordinates with LADOTD as necessary to ensure the inspections are fully incorporated into existing SMS practices, and in particular, SA. At present, LADOTD is developing detailed policies and procedures to administer this program.

The RTA is tasked with granting the LADOTD SSOA access for conducting risk-based inspections. Furthermore, the RTA is obligated to share the data it accumulates during the process of identifying hazards and assessing and mitigating safety risks with the SSOA. RTA is currently partnering with LADOTD SSOA to develop procedures governing these responsibilities.

3.2 Rules and Procedure Compliance Activities

A robust SMS requires ongoing SA activities; that is, continuous performance monitoring, conducted in the field with real-time assessment and data analysis, so as to provide management with the best and most reliable information for assessing performance.

General orders, bulletins, memos and notices are issued as interim measures until

⁷ <https://www.transit.dot.gov/regulations-and-guidance/safety/fta-special-directives>

permanent changes are made in the Operations Rulebook. To ensure the appropriate level of executive management oversight, Special Orders, Permanent Orders, Temporary Orders and Change Orders that modify or are intended to permanently establish rules and procedures must be approved and signed by the CSSEM.

All Rulebook revisions must be reviewed and approved in a committee format, as described in the Rulebook. Updates may be selected for joint review by either the Labor Management Safety Committee or SMS Steering Committee, at the discretion of the CSSEM.

Operations technical management and Executive-level management are responsible for monitoring compliance with rules and procedures.

Note: At this time, the process by which all rules compliance activities are coordinated between Operations and Safety is still in development. Cloud-based applications are being evaluated which are intended to help with coordination between Operations, Safety, and HCWD personnel concerning rules compliance and employee management.

3.3 Internal Safety Reviews

RTA has three types of ongoing, internal safety reviews to monitor compliance with its SMS as described in this ASP. These reviews are required under 49 CFR Part 673.27(b). They are:

1. Triennial Internal Safety Management Audit Program (ISMAs)

This program, also required under 49 CFR Part 674.27(a)(4), is owned by the Accountable Executive and implemented by the CSSEM. Each SMS component and subcomponent and the related activities and functions described in this ASP is audited once every three years. As of 2023, individual ISMAs (performed once annually) are intentionally organized by their corresponding SMS component (Safety Policy, Safety Risk Management, Safety Assurance, and Safety Promotion), in order to foster and enhance collaboration between auditors and auditees and to reinforce the principles and basic framework of SMS to continuously improve the RTA's safety culture.

Deficiencies require CAPs to be developed and implemented by the department or functional area. All ISMA reports are submitted annually to the SSO under the CEO's signature as required by the SSO and 49 CFR Part 674.

SOP 004-100 dictates that prior notice is given to the SSO and all ISMA activities adhere to SSO requirements. Final audits are shared with the SMS Steering Committee and may be discussed at subsequent SMS Steering Committee meetings. The CSSEM is tasked with overseeing the process and is certified to

serve as Lead Auditor.

The rolling three-year calendar for upcoming ISMA topics is provided in the Annual Report due to the SSO on or around February 15th of every year. The CSSEM may recommend changes to the topic list in-between Annual Reports, pending SSO concurrence.

As of 2021, the audit of the CSSEM's SMS compliance is performed by the Director of Internal Audit and Compliance, who reports to the Chief Financial Officer. The Director of Internal Audit and Compliance also provides general support to the ISMA process.

2. Safety Department-led Safety Assurance (SA)

Key SMS personnel, at the direction of the CSSEM, conduct periodic, unannounced SA inspections or field observations to ensure compliance with safety-critical rules and procedures.

The CSSEM oversees the process to ensure integrity and compliance, and has the discretion to require more regular reporting if necessary in a given area. Staff document their observations and any non-compliances using the appropriate SA form. The Safety Department has developed forms specific to certain, higher risk activities, e.g., special streetcar operations, flagging/Maintenance-of-Way, and special track work. Findings, trends, and concerns will be presented to ELT, department management, and/or safety committees, as appropriate. If necessary, the Key SMS personnel are authorized to cease operations or a work activity if they identify an imminent hazard posing an unacceptable level of safety risk. They have the authority and responsibility to coach any employees whom they observe failing to comply with a procedure or committing an unsafe act. These one-on-one coaching sessions are then documented using a standard form.

3. Monitoring of Safety Performance Measures.

Monitoring of the system wide Safety Performance Measures identified in Section 1.1.1 requires all departments that collect data directly applicable to the Performance Measures report these measures to the CSSEM or designee at their request. Generally, progress relative to the SPTs set forth in the ASP will be reviewed in SMS Steering Committee meetings and/or other Executive Level Management/ ELT meetings.

Internal safety reviews are designed to monitor all activities and functions to identify non-compliances with the ASP and correct them, identify hazards, and implement mitigations to reduce safety risk. They are also a means of identifying any existing mitigations that may be ineffective, inappropriate or were not implemented as intended as required.

The CSSEM or designee will coordinate with and support any department that has a non-compliance or deficiency with developing a CAP and/or mitigation as necessary. [Also see 3.7.1 Corrective Action Plans (CAPs).]

3.4 Safety Assurance: Maintenance and Support Functions

In addition to the above SA activities that apply for all departments, there are maintenance and related support functions under the purview of the CAMO, specifically.

These functions of maintenance control are fully documented in Maintenance Control Plans, processes and procedures for the following areas:

- a. Preventive, predictive, and corrective maintenance – rail, bus, paratransit/automotive/non-revenue maintenance, MOW (rail infrastructure), and facilities maintenance
- b. Support activities, including contracted activities (component repair, equipment repair, overhaul, metrology, transportation, mainline recovery, fabrication)
- c. Hazard management, quality assurance and quality control
- d. Lifecycle Planning, including reliability and maintainability
- e. Supply chain, procurement and materials management and warehousing
- f. Fleet management and transit stop maintenance
- g. Transit Asset Management support and interface

Refer to the Maintenance Control Plans, and related procedures, for each maintenance department.

3.5 Investigations

49 CFR Part 673.27(b)(3) requires the transit agency to establish activities to conduct investigations of safety events to identify causal factors. FTA's SMS approach requires investigations to apply the "Organizational Approach;" that is, all investigations will seek to identify causal and contributing factors instead of simply blaming the person closest to the event.

Internal investigations of all FTA-defined safety events are initiated by the department or functional area that experienced the event in accordance with the RTA Investigation SOP #004-005. That department or functional area will continue to carry out the investigation unless otherwise directed by the Safety Department or an external investigator (e.g., FTA, SSO, NTSB).

Major event investigations are the responsibility of the CSSEM and the Safety Department. These include: any events which meet a reporting threshold for the SSO and/or FTA, any events classified as "Tier 1" by RTA, and any events otherwise deemed serious by the CSSEM

Corrective actions stemming from any findings contained in the final investigation report must be developed by the departments and functional areas, in consultation with the Safety Department, and be approved by the SSO prior to implementation. Upon receipt of formal approval, actions are coordinated and managed by the CSSEM and fully implemented in the approved time frame by the responsible party(ies). Responsible parties may or may not reside in the department or functional area that initially reported the safety event.

Generally, RTA will take appropriate measures (mitigations) to reduce the level of safety risk (likelihood and/or severity) associated with identified contributing factors in order to prevent reoccurrence. One or more CAPs may comprise a single safety risk mitigation.

CAPs may also be unrelated to the mitigation(s) as they may be aimed at addressing system deficiencies or non-compliances that were identified during the investigation but did not contribute to the event.

The CAP management process will be carried out at the direction of the CSSEM, in accordance with SSOPS requirements. [Also see 3.7.1 Corrective Action Plans (CAPs).]

3.5.1 Event Reporting

RTA is required to report events as defined by FTA and the SSO. Part 674 defines three types of safety events: accidents, incidents, and occurrences, and requires a rail transit agency (RTA) to notify its SSO and the FTA within two hours of any event classified as an accident. RTA will adhere to the reporting and notification requirements outlined in 49 CFR Part 674 and related guidance⁸.

Reporting to the SSO is defined in the SSOPS, and FTA is notified through the US DOT Crisis Management Center (CMC) by email at toc-01@dot.gov. The OCC is the primary responsible party for issuing the notification, in consultation with the on-call Safety representative, as necessary.

RTA attends monthly meetings to discuss accidents, including reporting and the status of investigations of SSO-reportable events, with the SSO. Additional follow-up meetings may be scheduled in coordination with the SSO, as necessary.

3.6 Management of Change (MOC)

The Management of Change (MOC) process is designed to identify and assess changes that might introduce new hazards or negatively affect the agency's safety

⁸ <https://www.transit.dot.gov/regulations-and-guidance/safety/two-hour-accident-notification-guide>

performance. RTA is dedicated to identifying such changes for further evaluation to ascertain if they can reasonably lead to adverse impacts.

The CSSEM employs a Director-led Configuration Management Committee (CMC). This committee, which operates as an SMS Subcommittee under the CSSEM, is responsible for reviewing Change Request Forms submitted by various RTA Project Managers. Within the MOC framework, a project manager is defined as any individual overseeing the implementation of a change in RTA's transit system that might pose a potential hazard. Such changes can either introduce new hazards or influence the suitability or efficiency of existing mitigation measures.

Whenever a change occurs, it must undergo evaluation via the SRM, as though it is a newly identified hazard. Refer to Section II – SRM for details.

The primary goal of the MOC Procedure is to guide and unify the actions taken to gauge the risk level associated with significant changes. However, the process might encompass minor changes that might lead to potential safety hazards. This procedure aligns SAF5, the SSCP, and the relevant section of this ASP.

Every department and functional area is tasked with identifying changes, conducting a preliminary assessment, and then escalating and forwarding any concerns to the CMC based on the determined safety risk level.

As the SMS Executive, the CSSEM escalates the analysis and any subsequent actions or mitigations to the Accountable Executive when deemed necessary. Furthermore, the CSSEM is authorized to mandate additional safety risk mitigation measures before approving a change. If the safety risk level remains unclear, or if there is a need for more technical expertise to determine risk, the designated representative from the CSSEM department may lead this analysis.

SA activities that may identify a need to manage change, include:

- Monitoring of service delivery activities (including field observations)
- Monitoring operations and maintenance data
- Analysis of employee safety reporting program
- Evaluations of the SMS
- Safety audits, studies, reviews, and inspections
- Safety surveys
- Investigations.

At a minimum, changes need to be assessed through SRM if they substantially change the system (e.g., streetcar line extensions) or constitute a major safety-critical re-design (excluding functionally and technologically similar (“in-kind”) replacements. When evaluated or considered through any SRM process, the evaluation or analysis must be properly documented.

The following areas are specialized sources of risk associated with change.

3.6.1 Safety and Security Certification

SSC is an FTA-defined process of verifying that certifiable elements and items comply with a formal list of safety and security requirements developed for major construction, rehabilitation or vehicle procurement projects. Certifiable elements are those project elements that, as determined through hazard analyses, can adversely affect the safety and security of customers, employees, emergency responders, or the public.

SSC is accomplished through a collaborative effort between the CSSEM and the applicable Project Team, which may include representatives from other RTA departments as well as project contractors.

The process is guided by RTA's SSCP which is jointly maintained by the CPCP and CSSEM.

The Safety and Security Certification Review Committee (SSCRC) reports to and receives direction from the SMS Steering Committee and provides guidance for RTA's SSC program.

3.6.2 System Modification

Physical changes to the system that are not governed by the SSC process often fall under the Engineering Modification Process. This includes evaluation and assurance, under the SRM process, that a proposed modification does not create unacceptable or undesirable risk in a system, vehicle, equipment or facility previously certified under the SSC process.

System modifications must be forwarded to the Safety Department for handling. Modifications may be subject to the Management of Change (MOC) Procedure as deemed appropriate by the CSSEM. Additionally, internal safety reviews and external audits of the Capital Projects and Maintenance Departments will include a careful review of this process, to ensure it is performing as intended.

3.6.3 Procurement

When the agency must make new procurements; changes to existing materials, vendors and contracts; or changes to the procurement process itself, RTA Executive-level management must apply the SRM process of this ASP to the extent practicable.

The process established for procurement follows the same steps as other changes:

1. The department or area must assess whether the change (procurement) will carry risk or introduce hazards.
2. If a consequence of the change being introduced is an increased level of safety

risk, the department or area must notify the Safety Department. Alternatively, through the internal, Automated Procurement System, the CSSEM “signs off” on all solicitation requests, change order requests, sole source requests, and state contract procurement requests. During this review stage, the CSSEM or designee considers whether the procurement creates a new hazard or otherwise elevates risk for the agency. The System allows the CSSEM or designee to attach additional requirements onto the request via a formal memorandum..

3. If appropriate, mitigations must be in place before the procurement is finalized or the change is made. This process will be led by the Safety Department, in consultation with the Procurement Department and the department/area securing the material, vendor, or contractor.

3.7 Continuous Improvement

Continuous Improvement is the process by which RTA examines its safety performance to identify safety deficiencies and carries out a plan to address the identified safety deficiencies. It consists of formal activities designed to evaluate the effectiveness of the SMS. Specifically, it will:

1. Identify the causes of sub-standard performance of the SMS
2. Determine the implications of sub-standard performance of the SMS in operations
3. Eliminate or mitigate such causes.

Its key elements are proper management of all activities through the SRM process; proper change management; compliance activities, including those contained herein in Section III – SA; and performance auditing.

Collectively, the annual ASP revision cycle and SMS Implementation Plan updates provide a framework for identifying and capitalizing on new opportunities to improve and grow the SMS. ELT is directly engaged in this process, through a combination of the SMS Steering Committee meetings and ongoing business processes (such as the annual workplan and budget review processes).

Once deficiencies in the SMS are identified, corrective actions must be implemented in accordance with this ASP and applicable SSO requirements. Opportunities for enhancement are also communicated to the appropriate ELT member or the CEO as Accountable Executive for consideration. As SMS Executive, the CSSEM is duly authorized to implement such corrective actions and recommend other enhancements needed to achieve a more mature SMS.

3.7.1 Corrective Action Plans (CAPs)

CAPs are required to correct non-compliance with the ASP or referenced internal requirements or deficiencies in the SMS; and otherwise by direction of the SSO or the FTA. Per FTA guidance on ASP implementation, CAPs are not to be confused with

mitigations, although in some instances, they may be one in the same. In either case, the CSSEM is ultimately responsible for monitoring and verifying completion and for ensuring the hazard or concern is adequately addressed. For hazards with lower-level SRIs, the CSSEM delegates this responsibility to the local department's point-of-contact or manager.

All CAPs must be reviewed and approved by the SSO per 674.27(a)(4). CAPs are submitted by the CSSEM to the SSO electronically for approval. Upon obtaining the SSO's approval, they are entered on the CAP log.

Usually, this approval is required prior to beginning implementation of the corrective action, but in exigent circumstances involving immediate protection of life and property, the action may be commenced and then reviewed and accepted or modified by the SSO. RTA will attend all scheduled meetings to discuss the CAPs and coordinate activities with the SSO. CAPs may also be coordinated and discussed in SMS Steering Committee and/or LMSC meetings.

The SSOPS indicates the conditions under which RTA is required to develop and carry out a corrective action. All CAPs at RTA will conform to the requirements of the SSOPS.

CAP closure is dependent upon SSO verification of closure and approval.

Section IV: Safety Promotion

A robust SMS is dependent upon ongoing management commitment to addressing safety risk through training and communication.

4.1 Competencies and Training

RTA is currently reviewing and updating its comprehensive safety training curriculum for all positions and functions. Training requirements that will be included in this comprehensive safety training program for operations and maintenance positions (at a minimum) will encompass:

1. Departmental and functional area responsibilities for training
2. Departments/areas/sections providing training, including all on-the-job training and technical training programs for supervisors
3. Specialized internal safety-related training programs [industrial safety, respirators, Blood-borne Pathogens (BBP), Roadway Worker Protection (RWP), SMS, investigation, emergency action plans, etc.] Note: RWP training is required that, in the course of their duties, may reasonably have to access or perform work in/along the RTA portion of the City of New Orleans right-of-way (“trackway”). Initial training is delivered in-person by Safety Department staff. Refresher training is required every three years thereafter for employees and every year for contractors.
4. Vendor-provided training programs controlled by RTA
5. Required initial training by department, area, and position
6. Technical training and professional development coursework
7. Continuing safety education and training, to include any required re-certification training by department, area, and position
8. Contractor training requirements
9. Training records creation, access, and maintenance
10. Certifications
11. Training Quality Assurance Program
12. Train-the-trainer programs
13. Student feedback and assessments
14. Trainer feedback and assessments
15. Incident management/ Incident Command System (ICS) training
16. Crisis awareness and de-escalation training.

Instruction in safe methods of operations and safety procedures is included in rulebooks, manuals, handbooks, and other documentation developed for the training and qualification of safety-critical personnel, maintained by the department in consultation with HCWD. Training consists of classroom training, field training, on-the-job training, and testing/evaluation.

Pursuant to statutory requirements from the Bipartisan Infrastructure Law, the

comprehensive safety training that operations and maintenance personnel receive must include de-escalation training. Under the direction of the CSSEM, Security and Transit Police staff deliver crisis awareness and de-escalation training for front-line operations and maintenance personnel and also incorporate de-escalation training into quarterly safety meetings hosted by the Safety Department.

The Manager of Operations Training and the Chief of Human Capital and Workforce Development (or designee) are jointly responsible for providing new and revised safety training programs to the CSSEM for review. Presently, one (1) maintenance training instructor also reports directly to the Director of Bus Maintenance and provides on-the-job training exclusively for new-hire and existing personnel in Bus and Rail Maintenance areas.

Key SMS personnel designated with direct responsibility for rail fixed guideway safety oversight are required to meet the training requirements codified in 49 CFR Part 672 to include the completion of refresher training every two years.

As of the adoption of this revision of the ASP, the key SMS personnel are:

- CSSEM
- All Safety Department and Emergency Management Department staff.

The CSSEM has directed these positions to take refresher training every two years, which consists of, at a minimum:

- “SMS Awareness” online course through TSI – one hour; and
- Any external or vendor-provided safety- or security-related course.

The combined refresher training coursework must include, at minimum, one hour of safety oversight training per FTA guidance⁹.

Each designated “key SMS” position is responsible for applying for and maintaining their individual certification with FTA and for providing documentation to the HCWD Department for recordkeeping in Neogov.

Physical Security staff are required to obtain the Transportation Safety and Security Program (TSSP) certificate from U.S. DOT in either bus or rail by June 30, 2026 or within three years of hire.

Optionally, all other personnel with SMS responsibilities in accordance with this ASP are encouraged, but not required, to obtain the TSSP certificate in either bus, rail, or both. There is no timeframe for achieving this certification and employees are responsible for sending documentation to the HCWD Department for recordkeeping in Neogov.

RTA does not consider any contractors to be “key SMS personnel”. Contractor

⁹ <https://www.transit.dot.gov/regulations-and-programs/safety/ptsctp-refresher-training-overview-fact-sheet>

employees are welcome to pursue and maintain PTSCTP and/or TSSP certification on their own.

(Also see 1.2.3 Key SMS Personnel with Direct Responsibility for Rail Fixed Guideway Safety Oversight)

A one-hour introductory course on SMS (“SMS 101”) is delivered by Safety Department staff to all new employees during new-hire orientation. A computer-based refresher course for “SMS 101” is currently under development.

As of 2023, all directors and above (directors and chiefs) must self-enroll in and complete the TSI course entitled “SMS Awareness” which is available online via TSI’s e-learning portal¹⁰. This must be completed within one year of being hired or promoted into the position. The certificate must be provided to Human Capital and Workforce Development (HCWD) for recordkeeping in the Neogov Learning Management System.

Additionally, all employees must take mandatory incident management/ Incident Command System (ICS) training through the Federal Emergency Management Agency’s (FEMA) online Emergency Management Institute, as follows:

- All employees must successfully pass IS-100 – Introduction to Incident Command System (Alternatively, the internal City-Assisted Evacuation Plan (CAEP) and IS-100 familiarization training is an acceptable substitute for this requirement.)
- Designated Incident Management Team positions must successfully pass:
 - o IS-200 – Basic Incident Command System for Initial Response
 - o IS-700 – An Introduction to the National Incident Management System
 - o IS-800 – National Response Framework, An Introduction.

Other introductory SMS, safety, security, and emergency management presentations and workshops are available upon request and have been delivered to senior leadership team members and individual departments. The Safety, Security, and Emergency Management Departments develop and adapt their training to cover the following topics as needed:

- SMS responsibilities and accountabilities specific to each department or function
- Employee Safety Reporting Program
- SMS documentation and recordkeeping requirements
- Hazard identification
- CAP management process
- How to assist the Safety Department with Safety Promotion efforts as outlined in this ASP section
- Emergency management roles and responsibilities under the All Hazards Plan

¹⁰ <https://tsi-dot.csod.com/client/tsi-dot/default.aspx>

- System security policies and procedures
- Crisis awareness and de-escalation.

4.2 Safety Communications

Effective safety communication is one of the foundational philosophies of SMS. Its purposes are to:

1. Ensure that personnel are aware of the SMS
2. Convey safety-critical information
3. Explain why particular safety actions are taken
4. Explain why safety procedures are introduced or changed
5. Provide feedback on employee-reported hazards and safety concerns.

The primary safety communication responsibility of the ELT at RTA, under the requirements of 673.23(c), is to actively and personally communicate the Safety Management Policy to all employees and contractors. Any changes to the Safety Management Policy must be approved and distributed to all employees. All approved policies are shared on the RTA Intranet, Policies folder, as well as through ADP. All employees are required to review and “acknowledge” all company policies in ADP. Additional tools for disseminating future revisions and for maintaining document control are under review.

Methods of communicating safety information to RTA employees include face-to-face meetings and interactions, sending agency-wide emails, posting and/or distribution of bulletins, department notices, and memoranda, sending electronic messages via the Computer-Aided Dispatch (CAD) system “Clever Devices”, and through a quarterly Safety Department newsletter. Posted information can be found at a central location in each department easily accessible to employees. The Safety Ambassador program is also intended to support Safety Promotion and foster two-way communication about safety initiatives and topics.

RTA's comprehensive employee safety promotion program includes the following elements:

- Facility/location safety inspections and audits with written reports and follow-up responses to employees as appropriate;
- Periodic employee awareness training;
- Periodic safety blitz or “stand-down” events;
- Quarterly safety meetings, typically administered by the Safety Department in cooperation with other departments;
- Mandatory crisis awareness and de-escalation training for operations and maintenance personnel;
- Employee safety, security, and emergency management training programs delivered by the corresponding department under the direction of the CSSEM;
- SMS training and workshops hosted by the Safety Department by request;

- Safety posters, and posting of reports, information, statistics, data, notices, bulletins, awareness campaigns, flyers, health services, employee assistance programs and other safety information in employee work areas;
- Annual worker right-to-know programs and industrial safety training; and
- Periodic insurance carrier/broker assessments.

4.2.1 Safety Committees

The executive-level safety committee at RTA is the SMS Steering Committee, the primary group responsible to provide guidance and direction to the agency and to the Accountable Executive on acceptable and unacceptable risk, resource allocation, the status of SMS implementation for each of their areas of control and the promulgation of safety policy and SMS agency-wide.

Pursuant to FTA requirements announced in a February 2022 “Dear Colleague” letter stemming from the Bipartisan Infrastructure Law, RTA created the LMSC as a joint advisory group with specific goals and objectives that were established by the law.

The LMSC as established in SAF5 complies with statutory requirements in Title 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law, specifically subsections (1)(A) and (5)(A).

The roles, responsibilities, and basic procedures for both the SMS Steering Committee and LMSC are contained in the Board-approved policy, SAF5. Of note, the LMSC is explicitly required to approve this ASP prior to it being reviewed and approved by the RTA Board of Commissioners.

DSCs are front-line and mid-level safety committees established to address department-specific safety issues and communicate safety concerns and hazard resolution status. The DSCs establish and foster a close working relationship with employees, unions, and management regarding safety issues.

The CSSEM employs a Director-led Configuration Management Committee (CMC). This committee, which operates as an SMS Subcommittee under SAF5 and reports to the CSSEM, is responsible for reviewing Change Request Forms submitted by various RTA Project Managers.

Other safety-focused committees that generally meet on an as-needed basis are described further in SAF5.

4.2.2 Hazardous Materials

All maintenance and support personnel who are required to use chemicals and hazardous or toxic substances are trained in the safe use of such substances. Employees who move to new positions are provided training in the use of any new chemicals that they may be assigned to use by the supervisor.

RTA is responsible for developing procedures that ensure compliance with the hazardous materials standards by all RTA employees and implementing the SA process for hazardous materials.

The chemical, hazardous material and GHS Safety Data Sheet (SDS) review process is incorporated into Maintenance Department procedures and training. All chemicals and hazardous materials used by RTA employees or in the RTA operating system shall be evaluated and approved by the CSSEM or his/her designee prior to use or testing of the product in accordance with the SOP.

The end user must ensure that the CSSEM has reviewed and provided written approval of the requested chemicals prior to procurement, including procurement utilizing blanket orders, petty cash, purchase cards, construction specifications or equipment specifications. Substitutes for chemical products and hazardous materials shall have prior CSSEM approval.

All users of any approved product must read the Evaluation/SDS Approval prior to using the product and follow all instructions and precautions. The CSSEM or his/her staff may conduct site visits where chemicals are being used to ensure that workers are aware of the hazards and that they are using the proper PPE.

4.2.3 Drug and Alcohol Compliance

RTA has developed a Drug & Alcohol Free Workplace Policy (HC23) to ensure a safe environment for the public and RTA employees.

The Designated Employee Representative (DER; reports to the Chief HCWD Officer) has primary responsibility for administering a Drug & Alcohol Testing Program in accordance with 49 CFR Part 40, Procedures for Transportation Workplace Drug and Alcohol Testing Programs and 49 CFR Part 655: Prevention of Alcohol Misuse and Prohibited Drug Use in Transit Operations. HC23 establishes procedures for the Drug and Alcohol Testing Program, which is administered by the DER, in close coordination with Operations, Maintenance, and Safety Departments. The appendix section of HC23 includes both a list of DOT safety-sensitive positions under the current organizational structure, as well as a list of non-DOT ("RTA") safety-sensitive position for which testing is conducted under RTA's authority.

APPENDICES FOLLOW

APPENDIX A: 2024 SAFETY PERFORMANCE TARGETS

The updated Safety Performance Targets (SPTs) are as follows. Total amounts are targeted by calendar year.

Streetcar

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	10	1.28	58	7.43	20,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020¹¹

^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)

+ Includes major safety events only

Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

As comparison, the current internal benchmark for preventable accidents is 2.3 per 100,000 VRM.

Fixed-Route Bus

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	30	0.52	30	0.52	8,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020

^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)

+ Includes major safety events only

Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

As comparison, the current internal benchmark for preventable accidents is 1.5 per 100,000 VRM.

¹¹ NTD Safety and Security Policy Manual

(<https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/ntd/146986/2020-ntd-safety-and-security-policy-manual.pdf>)

Non-Fixed-Route Bus (Paratransit)

Fatalities (total)	Fatalities (rate per 100k VRM)	Injuries*^ (total)	Injuries (rate per 100k VRM)	Safety Events*+ (total)	Safety Events (rate per 100k VRM)	Mean Distance Between Major Mechanical Failure
0	0.00	6	0.58	8	0.77	20,000

* As defined in the NTD Safety & Security Policy Manual, dated January 2020

^ Includes major and non-major reportable events but excludes injuries related to assaults or other crimes (security events)

+ Includes major safety events only

Determinations of accident/incident preventability have no bearing on any SPTs per FTA guidance.

As comparison, the current internal benchmark for preventable accidents is 1.5 per 100,000 VRM.

General Notes

For the purposes of establishing SPTs, safety events involving non-revenue vehicles are not included as they are not reported to NTD. Safety events involving RTA maintenance employees operating revenue service vehicles *are* included for their respective mode.

RTA's Safety and Security reporting for the previous three (3) years under NTD's Safety and Security Major and Non-Major criteria was accessed and reviewed in support of establishing SPTs. Due to differences in the reporting thresholds, the safety events reflected here are not necessarily the same as the streetcar safety events reported to LADOTD in accordance with 49 CFR Part 674.

All VRMs by mode are calculated using the most recent available year's actual, confirmed mileage data as shown in the NTD Agency Profile (NTD ID # 60032). The below VRMs are used for all mileage-based targets and were reported to NTD for report year 2022:

- Streetcar – 785,606
- Fixed-Route Bus – 6,261,592
- Non-Fixed-Route Bus – 1,216,836

SPTs are formally made available to the agency's Metropolitan Planning Organization (MPO), the Regional Planning Commission (RPC), per the requirements of 49 CFR Part 673.15(a), and to LADOTD annually for review and comment prior to finalizing the ASP. Refer to the Agency Safety Plan Revision SOP #004-002.

Notes on FTA's Definitions Used in this Section

(per PTASP Technical Assistance Center “TAC” website -- <https://www.transit.dot.gov/PTASP-TAC>):

FTA’s guidance on SPTs indicates that transit modes fall into one of three categories: rail modes, fixed-route bus modes, and non-fixed route bus modes. RTA’s SPTs are established for these modes, accordingly. The safety performance of passenger ferry services is not measured against any SPTs that are pertinent to this ASP.

For injuries, FTA uses the definition established by the NTD, which is “any damage or harm to persons as a result of an event that requires immediate medical attention away from the scene.” For the injury performance measure, FTA uses all injuries reported on both the NTD S&S-40 (major) and S&S-50 (non-major) forms but excludes injuries related to assaults or crimes (security events). This means a transit agency may have to report a crime-related injury to the NTD, but it would exclude that injury from its injury performance measures.¹²

For safety events, FTA uses all safety events that meet an NTD **major event** reporting threshold (events reported on the S&S-40 form, however excluding major security events). The NTD defines a safety event as a collision, derailment, fire, hazardous material spill, act of nature (Act of God), evacuation, or other safety occurrence not otherwise classified occurring on transit right-of-way, in a transit revenue facility, in a transit maintenance facility, or involving a transit revenue vehicle and meeting established NTD thresholds.

¹² See FTA Safety Performance Targets Fact Sheet (https://www.transit.dot.gov/sites/fta.dot.gov/files/2020-08/SafetyPerformanceTargetFactSheet_20200814.pdf)

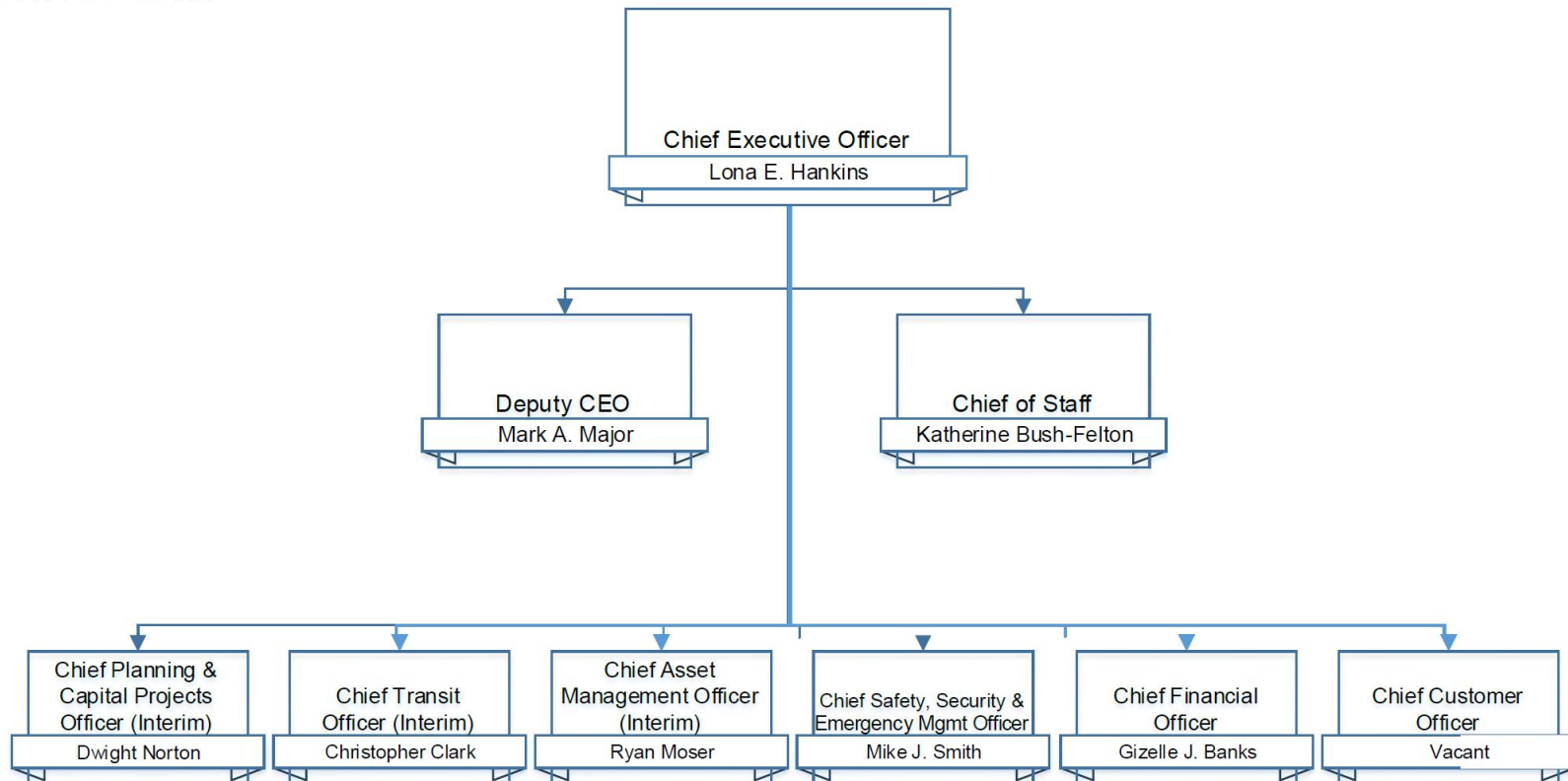
APPENDIX B: ORGANIZATIONAL CHART

Source: Interim Organizational Chart, 9/21/23

Notes: Chief HCWD Officer's functions are temporarily assigned to Deputy CEO and CFO.
Sarah McLaughlin Porteous is the Chief of External Affairs (replaced Chief Customer Officer).
Ryan Moser is the Chief Asset Management Officer.



Office of the CEO Executive Leadership Team



APPENDIX C: DEFINITIONS/ACRONYMS

Definitions

The following definitions used in this document are consistent with 49 CFR Parts 625, 630, 670, 673, and 674. The source of each is noted in brackets, including the “SMS Glossary of Terms: FTA’s Guide to Relevant Terms for SMS Development” of September 2016 shown as “[SMS]”.

Accident – an Event that involves any of the following: A loss of life; a report of a serious injury to a person; a collision involving an RTA vehicle; a runaway RTA vehicle; an evacuation for life safety reasons; or any derailment of an RTA vehicle [673] at any location, at any time, whatever the cause. [SMS]

An *accident* must be reported in accordance with the thresholds for notification and reporting set forth in Appendix A to Part 674. [674]

Accountable Executive – a single, identifiable person who has ultimate responsibility and accountability for the implementation and maintenance of the SMS of RTA; responsibility for carrying out the Safety Plan and Transit Asset Management Plan (TAMP); and control or direction over the human and capital resources needed to develop and maintain both the Safety Plan in accordance with 49 USC § 5329 and TAMP.

Administrator -- the Federal Transit Administrator or the Administrator’s designee. [670, 674]

Advisory -- a notice from FTA to recipients regarding an existing or potential hazard or risk in public transportation that recommends recipients take a particular action to mitigate the hazard or risk. [670]

Agency Safety Plan (ASP) – a document adopted by a Rail Fixed Guideway System, including RTA, detailing its safety policies, objectives, responsibilities, and procedures.

Audit -- an examination of records and related materials, including, but not limited to, those related to financial accounts. [670]

BTW -- Behind-The-Wheel, a type of required Operator training.

Capital asset -- a unit of rolling stock, a facility, a unit of equipment, or an element of infrastructure used in public transportation. [625]

CEO -- Chief Executive Officer of the Regional Transit Authority.

CFO -- Chief Financial Officer of the Regional Transit Authority.

Chief Safety, Security, and Emergency Management Officer (CSSEM) – an adequately trained individual who has responsibility for safety and reports directly to an RTA chief executive officer, president, or equivalent officer. [673]

CM -- Construction Manager of the Regional Transit Authority.

CMC – Configuration Management Committee, a Subcommittee of the SMS Steering Committee

Consequence -- the potential outcome(s) of a hazard. [SMS]

Continuous Improvement -- a process by which a transit agency examines safety performance to identify safety deficiencies and carry out a plan to address the identified safety deficiencies. [SMS]

Contractor -- an entity that performs tasks on behalf of RTA, FTA, a State Safety

Oversight Agency, or other rail transit agency, through contract or other agreement [674], including tasks required for rail compliance. For example, contractors could handle any portion of a major construction infrastructure project, handle daily switch inspections, or monthly substation maintenance. A contractor is a third party hired by the agency to fulfill a rail compliance need. The rail transit agency may not be a contractor for the oversight agency.

CTO –Chief Transit Officer (formerly Chief Operating Officer)

Corrective Action Plan (CAP) -- a plan developed by RTA (as a recipient and rail transit agency) that describes the actions that RTA will take to minimize, mitigate, correct, or eliminate risks and hazards, and the schedule for taking those actions. Either a State Safety Oversight Agency or FTA may require RTA to develop and carry out a corrective action plan. [670, 674, SMS]

DBE -- Disadvantaged Business Enterprise.

Directive -- a formal written communication from FTA to one or more recipients which orders a recipient to take specific actions to ensure the safety of a public transportation system. [670]

EEO -- Equal Employment Opportunity.

Equivalent Authority – The Board of Commissioners of the New Orleans RTA is an entity that carries out duties similar to that of a Board of Directors, for a recipient or subrecipient of FTA funds under 49 U.S.C. Chapter 53, including sufficient authority to review and approve the Safety Plan. [673, SMS]

Event – any Accident, Incident, or Occurrence. [673, 674, SMS]

FTA – the Federal Transit Administration (FTA) is an operating administration/agency within the United States Department of Transportation (USDOT). [670, 673, 674]

FMLA -- Family Medical Leave Act

FRA – the Federal Railroad Administration (FRA), an agency of the United States Department of Transportation (USDOT). [674]

Grade Crossing (as defined in the National Transit Database glossary) an intersection of roadways, railroad tracks, or dedicated transit rail tracks that run across mixed traffic situations with motor vehicles, streetcar, light rail, commuter rail, heavy rail or pedestrian traffic; either in mixed traffic or semi-exclusive situations.

Hazard – any real or potential condition that can cause injury, illness, or death; damage to or loss of a facility, equipment, rolling stock, infrastructure, property, system RTA; or damage to the local environment, or reduction of ability to perform prescribed function. [673, 674, SMS]

Hazard Analysis -- the formal activities to analyze potential consequences of hazards during operations related to provision of services. [SMS]

Hazard Identification -- formal activities to analyze potential consequences of hazards during operations related to provision of service. [SMS]

Incident – an event that involves any of the following: a personal injury that is not a serious injury; one or more injuries requiring medical transport; or damage to facilities, equipment, rolling stock, or infrastructure that disrupts the operations of RTA. [673, 674, SMS]

An incident must be reported to FTA's National Transit Database in accordance with the thresholds for reporting set forth in Appendix A to Part 674. If a rail transit agency or State Safety Oversight Agency later determines that an Incident meets the definition of *Accident* in this section, that event must be reported to the SSOA in accordance with the thresholds for notification and reporting set forth in Appendix A to Part 674. [674]

RTA has also defined Incident as an unexpected event, including security-related incidents, involving RTA passengers or employees that is not related to an accident. Incidents of significant magnitude must be reported to state and/or federal authorities. See Accident Reporting Threshold for a list of reportable incidents.

Investigation – the process of determining the causal and contributing factors of an accident, incident, or hazard, for the purpose of preventing recurrence and mitigating risk [673, 674, SMS] or investigation of an event [670].

Labor-Management Safety Committee (LMSC) – Established by SAF5, consists of a voting roster of 6 designated managers/directors and 6 representatives from the two main labor unions at RTA.

Lagging Indicators -- provide evidence, through monitoring, that intended safety management outcomes have failed or have not been achieved. [SMS]

Leading Indicators -- provide evidence, through monitoring, that key safety management actions are undertaken as planned. [SMS]

Management of Change -- a process for identifying and assessing changes that may introduce new hazards or impact the transit agency's safety performance. If a transit agency determines that a change may impact its safety performance, then the transit agency must evaluate the proposed change through its Safety Risk Management process. [SMS]

Near miss -- a safety event where conditions with potential to generate an accident, incident, or occurrence existed, but where an accident, incident, or occurrence did not occur because the conditions were contained by chance or by existing safety risk mitigations. [SMS]

LADOTD -- the "State of Louisiana Department of Transportation and Development" which is the designated State Safety Oversight Agency for rail fixed guideway systems in the State of Louisiana.

National Public Transportation Safety Plan (NSP) – the plan to improve the safety of all public transportation systems that receive Federal financial assistance under 49 U.S.C. Chapter 53 [673, 674] or authorized at 49 U.S.C. § 5329. [670]

NTSB -- the National Transportation Safety Board, an independent Federal agency. [674]

OCC -- Operations Control Center, also known as "Dispatch"

Occurrence – an Event without any personal injury in which any damage to facilities, equipment, rolling stock, or infrastructure does not disrupt the operations of RTA. [673, 674, SMS]

Organizational Accident -- an accident that has multiple causes involving many people operating at different levels of the respective agency. [SMS]

OCS – Overhead Catenary System.

Performance measure -- a parameter that is used to assess performance outcomes. [625]

Performance target – a specific level of performance for a given performance measure over a specified timeframe. [625, 673]

PHA -- Preliminary Hazard Analysis

PPE – Personal Protective Equipment

Practical Drift – the slow and inconspicuous, yet steady, uncoupling between written procedures and actual practices during provision of services. [SMS]

Program Standard (SSOPS) is a written document developed and adopted by LADOTD that describes the policies, objectives, responsibilities, and procedures used to provide safety and security oversight of rail transit agencies.

Public Transportation Agency Safety Plan (PTASP) -- the comprehensive agency safety plan for RTA that is required by 49 U.S.C. § 5329 and Part 673 [673], based on a Safety Management System. Until one year after the effective date of FTA's PTASP final rule, a System Safety Program Plan (SSPP) developed pursuant to 49 CFR part 659 may serve as the rail transit agency's safety plan. [674]

Public Transportation Safety Certification Training Program (PTSCTP) -- the certification training program for Federal and State employees or other designated personnel who conduct safety audits and examinations of public transportation systems, and for employees of public transportation agencies directly responsible for safety oversight, established by FTA in accordance with 49 U.S.C. § 5329(c)(2), codified in 49 CFR Part 672. [674, 672]

Public Transportation System -- the entirety of RTA's operations, including the services provided through contractors. [625, SMS]

Rail fixed guideway public transportation system -- any fixed guideway system that uses rail, is operated for public transportation, is within the jurisdiction of a State, and is not subject to the jurisdiction of the Federal Railroad Administration (FRA), or any such system in engineering or construction. Rail fixed guideway public transportation systems include but are not limited to rapid rail, heavy rail, light rail, monorail, trolley, inclined plane, funicular, and automated guideway. [674, SMS]

RFP – Request for Proposals

Risk -- the composite of predicted severity and likelihood of the potential effect of a hazard. [674, SMS]

Risk mitigation – a method or methods to eliminate or reduce the effects of hazards. [673, 674, SMS]

ROW -- right-of-way

RTA -- the New Orleans Regional Transit Authority.

Safety – the state in which the potential of harm to persons or property damage during operations related to provision of services is reduced to and maintained at an acceptable level through continuous hazard identification and safety risk management activities. [SMS]

Safety and Security Certification (SSC) -- the process applied to project development to ensure that all practical steps have been taken to optimize the operational safety and security of the project during engineering, design, and

construction before the start of passenger operation.

Safety Assurance – processes within RTA SMS that functions to ensure the implementation and effectiveness of safety risk mitigation, and to ensure that RTA meets or exceeds its safety objectives through the collection, analysis, and assessment of information. [673, SMS]

Safety Deficiency – a condition that is a source of hazards and/or allows the perpetuation of hazards in time. [SMS]

Safety Management Policy – RTA’s documented commitment to safety, which defines RTA’s safety objectives and the accountabilities and responsibilities of its employees in regard to safety. [673, SMS]

Safety Management System (SMS) – the formal, top-down, RTA-wide approach to managing safety risk and assuring the effectiveness of RTA’s safety risk mitigation. SMS includes systematic procedures, practices, and policies for managing risks, hazards [673], and management of safety risk [625, 670, SMS].

Safety Management System Executive -- a Safety Officer or equivalent. [SMS]

Safety Promotion – a combination of training and communication of safety information to support SMS as applied to RTA’s system. [673, SMS]

Safety Risk – the assessed probability and severity of the potential consequence(s) of a hazard, using as reference the worst foreseeable, but credible, outcome. [673, SMS]

Safety Risk Management (SRM) – a process within RTA’s SMS/Safety Plan for identifying hazards and analyzing, assessing, and mitigating safety risk. [673, 674, SMS]

Safety Risk Mitigation -- the activities whereby a public transportation agency controls the probability or severity of the potential consequences of hazards. [SMS]

Security is defined as freedom from intentional danger for employees and passengers.

Serious injury – any injury which: (1) Requires hospitalization for more than 48 hours, commencing within 7 days from the date of the injury was received; (2) Results in a fracture of any bone (except simple fractures of fingers, toes, or nose); (3) Causes severe hemorrhages, nerve, muscle, or tendon damage; (4) Involves any internal organ; or (5) Involves second- or third-degree burns, or any burns affecting more than 5 percent of the body surface. [673, 674]

SIS -- the Service, Inspection, and Storage building for the RTA Canal Street and Riverfront streetcars located at the A. Philip Randolph Facility at 2817 Canal Street.

SMS Executive – a Safety Officer or an equivalent. [673]

SMS Steering Committee (SMSSC) – executive-level safety committee established by SAF5

SRM – Safety Risk Management (see above).

SSCP -- Safety and Security Certification Plan

SSCRC -- Safety and Security Certification Review Committee

State Safety Oversight Agency (SSOA; SSO) – an agency established by a State that meets the requirements and performs the functions specified by 49 U.S.C. § 5329(e) and the regulations set forth in 49 CFR part 674 [670, 673, 674,

SMS].

TPA -- Third Party Administrator

Transit asset management (TAM) -- the strategic and systematic practice of procuring, operating, inspecting, maintaining, rehabilitating, and replacing transit capital assets to manage their performance, risks, and costs over their life cycle in order to provide safe, cost-effective, and reliable service. [625]

USDOT – United States Department of Transportation.

APPENDIX D: LIST OF SAFETY POLICIES AND STANDARD OPERATING PROCEDURES

This ASP references the following, related Organizational Policies and Standard Operating Procedures. Contact the Safety Department to obtain copies or for additional information.

ID	Title	Revision Date
004-100	Procedure for Performing Internal Safety Management Audits (ISMA)	11/09/23
004-002	Agency Safety Plan Revision	10/07/22
004-005	Accident/Incident Investigation (revision in progress)	6/15/20
004-006	Safety Assurance of Safety Critical Areas	10/20/20
004-007	On-Call Safety Representative Procedures	10/5/21
004-008	First Aid Cabinets	3/24/22
004-009	Working in Hot Weather	3/24/22
004-010	Management of Change Procedure	TBD
004-011	Right of Way Permit Procedure	In Dev.
HC23	RTA Drug and Alcohol Free Workplace Policy	12/14/23
SAF2	RTA Distracted Driving Policy	2/23/21
SAF3	RTA Safety Management Policy	6/28/22
SAF4	RTA General Accident and Injury Policy	2/23/21
SAF5	RTA Safety Committee Structure	6/28/22
SAF6	RTA Personal Protective Equipment Policy	8/24/21
	Safety and Security Certification Plan	11/03/23
	RTA All Hazards Plan	8/17/22
	RTA Exercise Plan	10/28/22
	RTA Employee Safety and Health Handbook	10/16/23
	RTA Emergency Preparedness and Response Guide	In Dev.



**New Orleans Regional Transit
Authority**

**Multi-Year Strategic Plan
for
Safety Management System Implementation**

2020 – 2025

Updated: December 19, 2023

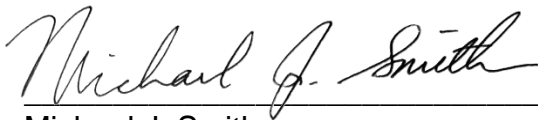
Policy Statement for Safety Management System Implementation

RTA is committed to improving the quality and effectiveness of its system-wide safety management programs aimed at reducing safety risk and eliminating or controlling hazards. This Safety Management System (SMS) Implementation Plan (or SIP) identifies several interrelated tasks that will help RTA achieve its safety objectives, which are outlined in Safety Management Policy (SAF3). The SMS methods and tools that we will use to carry out these tasks, and detailed descriptions of the key roles throughout the agency for accomplishing this important work, are contained in RTA's Agency Safety Plan (ASP).

The goal of the SIP is to identify, coordinate, and direct activities relative to the implementation of RTA's SMS on a system-wide basis under all applicable FTA requirements. The SIP provides key performance objectives and milestones that are instrumental in implementing SMS and have been tracked since its adoption at RTA in 2020.

Very intentionally, the SIP is designed to be reviewed and updated annually, along with the companion ASP and other SMS documents. In close coordination with the executive leadership team, the Safety Department will leverage these reviews to ensure we are on the right path toward achieving a mature SMS.

Together, we will build, implement, and sustain a fully functioning SMS that will drive positive safety improvements and help position us to become a world-class transit system.



Michael J. Smith
Chief Safety, Security, and Emergency Management Officer
SMS Executive

Implementation Plan (Updated)

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
SMS Documentation	Perform a document audit to establish all current documented procedures and identify gaps.	Office of Internal Audit & Compliance is developing an SOP catalogue. RTA will issue an RFP for external support Fall 2023.	Ensure that all departments have procedures and the necessary resources to support: hazard identification, risk assessment, tracking corrective actions to closure, and monitoring of mitigations (SA), including the use of appropriate tracking logs/risk registers.	Office of Internal Audit & Compliance is developing an SOP catalogue. RTA will issue an RFP for external support Fall 2023.
	RTA Policy Manual is currently in development.	Complete	Review and revise all documentation annually, including the emergency preparedness plan, rulebooks, SOPs, safety policy statement, safety performance targets, SIP, and all other documentation supporting the ASP/SMS.	Complete for Safety documentation. All rules, SOPs, and other documents will be reviewed annually.
			Ensure that all customer concerns are captured from: public meetings; customer calls and electronic communications; and	Hazard Report form And Vorex helpdesk have been implemented.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
			face-to-face interactions with RTA employees.	
			Safety Department ensures this information is captured in logs/registers and elevates to ESSC or Executive-level management, as appropriate.	Complete
Safety Committee Structure	Re-establish the ESSC under a revised SOP/Charter to focus on SMS objectives, priority accidents/hazards, and other business based on safety criticality.	Complete	Ensure that all departments appropriately elevate identified hazards and safety concerns to the ESSC's attention, in consultation with the Safety Department.	DSCs trained on escalation procedures. SMS 101 training roll-out is supporting. Safety Ambassador training in development.
	Establish a new hierarchy and reporting structure between the ESSC and Departmental Safety Committees (DSCs).	Complete	Well-managed DSCs will ensure two-way communication related to hazards, safety concerns, and safety programs, and will encourage participation in SRM and SA processes.	Work continues to promote/elevate DSCs and Safety Ambassador program.
	Educate the ESSC on the current Safety Management Policy Statement and their roles and responsibilities	Complete	Task the Safety Department with providing technical assistance to DSCs as necessary to ensure	Complete

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	related to key safety objectives.		effectiveness.	
	Incorporate safety objectives into meeting agenda.	Complete		
	Invite ATU Local 1560 to DSCs as appropriate.	Complete; Note: Also new LMSC has since been created.		
	Provide baseline SMS training to DSCs.	CBT version of SMS 101 course currently in development. Safety Ambassador program currently in development.		
Safety Assurance Activities	Establish Management of Change process including roles and responsibilities for all departments and elevation to the ESSC as necessary.	Complete; See SAF5 and MoC Procedure.	Establish process whereby Safety Department leads SA activities and concerns are elevated to the ESSC as necessary.	Complete
	Finalize and document in the M of C process, all major changes that must be assessed through SRM:...	Complete	Distribute SA findings through the Safety Committees and other means.	Complete
	Prepare a document map to ensure that all changes in the organization are reflected in all critical documentation.	Complete	Ensure that all corrective actions for ineffective mitigations identified through the SA process are fully documented.	Complete

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Develop and implement training on the new A/I Investigation procedure as appropriate.	Draft A/I SOP is currently near completion. RTA hosted Fundamentals in Bus Collision Investigation course in 2023.		
Employee Safety Reporting Program	Implement the program as described in the ASP. Provide regular updates to the Executive-level management and the ESSC.	Complete		
	Revise and finalize an official hazard-/unsafe behavior-reporting form.	Complete		
	Re-establish a safety hotline (pending staffing plan and transition to in-house O&M responsibilities). Set up email "hotline" option in the interim.	Complete		
	Establish Safety Department protocols for managing the safety hotline.	Complete		
	When ready to launch, initiate robust training on the employee safety reporting program.	Complete		

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Develop a centralized system where all hazards and safety concerns can be placed for Safety Department analysis and to aid communication efforts.	Vorex Helpdesk application is live; Currently developing protocols whereby other teams/departments send in local-identified hazards or concerns for tracking.		
Communication of Safety Information	Ensure that all hazard identification, assessment, and mitigation activities are led by the Safety Department and are properly documented, tracked and shared, through Safety Committees, newsletters, bulletins, and other means.	Complete		
Training	Centralize management of training; use a matrix for monitoring compliance with program requirements.	Completed in 2023, however needs to be revised due to more recent CAPs and findings	The training policy needs to include safety-related training for all employees and contractors. The Safety Department will monitor each department's compliance with stated training requirements.	New training policies established in Operations and Maintenance. Safety is providing technical assistance.

Topic	Short Term (12 months or less)	Current Status	Medium Term (13 to 36 months)	Current Status
	Develop Training Plan (to be maintained by the CSSEM and provided to SSO/FTA by request).	Complete; CSSEM maintains the PTSCPT training plan for Key SMS personnel.	The training policy needs to include specific requirements and monitoring activities for contractor safety training.	Team is working on incorporating training requirements in Safety's review of upcoming procurements, focusing on long-term contracts and capital projects.
	Establish 3-year plan for engaging external training providers, including TSI, NSC, and others.	See above re: TSI. CSSEM is requesting additional courses. A 3-year plan is under development.	Develop and provide biennial refresher training after completion of initial requirements per 49 CFR Part 672, which must require one hour of safety oversight training.	Complete
Miscellaneous	Participate in ferry operator-led safety meetings; hold joint meetings	Complete	Ensure that exercises (e.g., full-scale, tabletop) are held annually, both internally and with external agencies.	Complete
	Drug & Alcohol Program is in development and will be aligned with organizational structure changes, effective October 1, 2020.	Complete	Integrate ferry operations into RTA's SMS.	Not applicable

APPENDIX F: REQUIRED APPROVALS

The LMSC, comprised of 50% labor and 50% RTA management, pursuant to the statutory requirements in Title 49 U.S.C. § 5329(d) as amended by the Bipartisan Infrastructure Law, subsections (1)(A) and (5)(A), reviewed, and considered the approval of, the draft ASP during its regular, quarterly meeting on **December 6, 2023**. Below is a summary table of the final approval vote via Microsoft SharePoint Forms. All Committee proceedings were conducted in accordance with RTA Safety Committee Policy (SAF5).

The ASP was approved by the LMSC by simple majority.

ID	Start time	Completion time	Please enter your name (First Last):	Are you representing Labor or Management?	LMSC Member	Do you approve the draft ASP as presented?
16	12/5/23 23:49:53	12/5/23 23:51:44	Darius I Hollins	Labor	Yes	Approve
17	12/6/23 13:04:30	12/6/23 13:05:46	Tonya Ellis	Management	Yes	Approve
18	12/6/23 13:54:56	12/6/23 14:02:18	Dwight Norton	Management	No	Approve
19	12/7/23 6:30:33	12/7/23 6:31:26	Robert Clapp	Labor	Yes	Approve
20	12/7/23 13:41:05	12/7/23 13:41:40	Kentrella Crawford	Management	Yes	Approve
21	12/8/23 11:47:37	12/8/23 11:47:53	Darian	Labor	Yes	Approve
22	12/8/23 12:21:59	12/8/23 12:22:09	Ryan Moser	Management	No	Approve
23	12/11/23 7:26:43	12/11/23 7:27:06	Keith Stevens	Labor	Yes	Approve
24	12/19/23 16:24:15	12/19/23 16:24:46	Floyd Bailey jr	Management	Yes	Approve

PLACEHOLDER FOR BOARD RESOLUTION